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DOCUMENTS RELATED TO BEATTIE FARMS SOUTHWEST'S INADVERTENT OVERRUN AND PAYBACK FOR OVERRUNS INCURRED IN CALENDAR YEARS 2011 AND 2012

1. Reclamation's letter to Beattie Farms Southwest dated June 22, 2012, notifying it of its calendar year 2011 overrun.
2. Beattie Farms Southwest IOPP Payback Plan for Calendar Years 2013-2015 dated August 9, 2012.
3. Reclamation's letter to Beattie Farm Southwest dated December 31, 2012, approving its IOPP Payback Plan for Calendar Years 2013-2015.
4. Reclamation's letter to Beattie Farms Southwest dated June 7, 2013, notifying it of its calendar year 2012 overrun.
5. Beattie Farms Southwest IOPP Payback Plan for Calendar Year 2014 dated August 15, 2013.
6. Reclamation's letter to Beattie Farm Southwest dated September 21, 2013, approving its IOPP Payback Plan for Calendar Year 2014.
7. Beattie Farms Southwest IOPP Certification Report for Calendar Year 2013.
8. Reclamation's letter to Beattie Farms Southwest dated May 5, 2014, verifying its 2013 IOPP payback amount of 472 acre-feet.
9. Reclamation's letter to Beattie Farms Southwest dated December 3, 2014, notifying it that it was at risk of exceeding its calendar year 2014 adjusted entitlement.
10. Reclamation's letter to Beattie Farms Southwest dated February 12, 2015, notifying it of provisional Calendar Year 2014 exceedance of adjusted entitlement and requesting a revised payback plan for calendar year 2015.
11. Beattie Farms Southwest IOPP Certification Report for Calendar Year 2014.
12. Reclamation's letter to Beattie Farms Southwest dated May 12, 2015, verifying its 2014 IOPP payback amount of 110 acre-feet.
13. Beattie Farms Southwest Revised IOPP Payback Plan for Calendar Year 2015 dated March 20, 2015.
14. Reclamation's letter to Beattie Farm Southwest dated May 12, 2015, approving its Revised IOPP Payback Plan for Calendar Year 2015.
15. Beattie Farms Southwest IOPP Certification Report for Calendar Year 2015 dated February 26, 2016.
16. Reclamation's letter to Beattie Farms Southwest dated May 2, 2016, verifying its 2015 IOPP payback amount of 106 acre-feet.



United States Department of the Interior

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

IN REPLY REFER TO:

LC-4220
WTR-4.03

JUN 22 2012

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1076 Highway P
O'Fallon, MO 63366

Subject: Notice of Calendar Year (CY) 2011 Overrun of Colorado River Entitlement by Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) established requirements for payback of any inadvertent overuse of Colorado River water by users in the Lower Division States. A copy of the IOPP is enclosed for reference. In accordance with the IOPP, this letter informs you that the Bureau of Reclamation's final water accounting records for CY 2011 document that the Farm incurred an overrun of 453 acre-feet.

An overrun governed by the IOPP occurs when an entitlement holder inadvertently diverts, pumps, or receives Colorado River water in excess of the water user's entitlement for that year. Under Contract No. 05-XX-30-W0446, the Farm is entitled to divert up to 1,110 acre-feet per year for use within the Farm's contract service area. As published in the *Colorado River Accounting and Water Use Report Arizona, California, and Nevada Calendar Year 2011*, the Farm diverted 1,563 acre-feet in CY 2011, thereby exceeding its annual entitlement by 453 acre-feet.

An entitlement holder incurring an inadvertent overrun is required to submit a payback plan to Reclamation that demonstrates how the entitlement holder will intentionally forbear use of Colorado River water by implementing extraordinary conservation measures sufficient to meet its payback obligation. Examples of extraordinary conservation measures that might be used to meet a payback obligation include, but are not limited to: delivery system improvements, land fallowing, seepage recovery, on-farm conservation (e.g. scientific irrigation scheduling, salinity management, and soil moisture monitoring), forgone banking of Colorado River water off-stream, and exchange of Colorado River water for water banked off-stream. For overruns

incurred in CY 2011, an entitlement holder must submit a payback plan to Reclamation by July 23, 2012. An entitlement holder's payback plan must describe:

- a. The cause of the overrun.
- b. The extraordinary conservation measure(s) that will be implemented to pay back the overrun.
- c. The schedule, location, and amount of water that will be conserved by the payback measure(s), and information that adequately demonstrates that the proposed payback measure(s) is: (1) in addition to measure(s) being implemented to conserve water in accordance with any existing water transfer agreements, water conservation agreements, or Intentionally Created Surplus Plans of Creation, and (2) in addition to the measures implemented in any Reclamation-approved water conservation plan.
- d. How the payback measure(s) being implemented will meet the payback obligation.
- e. The amount of Colorado River water that will be conserved and/or supplemented by the payback measure(s) being implemented, for each year in the case of 3-year payback plans.
- f. The method(s) by which Reclamation will be able to monitor the implementation of the payback plan and verify the amount of payback.

In accordance with Section 2.3 of the IOPP, payback of the Farm's CY 2011 overrun will begin in CY 2013. The number of years within which an overrun must be paid back, and the minimum payback amount required in each year are defined in Section 2.6 of the IOPP. The Farm's payback for the CY 2011 overrun is governed by Section 2.6.c. of the IOPP, which provides for a 3-year payback schedule. The minimum required payback amount each year under Section 2.6.c. is "the greater of 20 percent of the individual entitlement holder's maximum allowable cumulative overrun account amount or 33.3 percent of the total account balance." The IOPP limits an entitlement holder's cumulative overrun account amount to a maximum of 10 percent of the entitlement holder's annual entitlement.

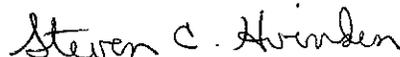
Based on the Farm's annual entitlement of 1,110 acre-feet, the Farm's cumulative overrun account limitation is 111 acre-feet ($1,110 \text{ acre-feet} \times 0.10 = 111 \text{ acre-feet}$). The Farm's 453 acre-foot overrun results in a cumulative overrun account balance that is 40.8 percent of the Farm's entitlement; therefore, the Farm is required to pay back 342 acre-feet during the first year of its payback obligation in order to reduce its overrun account balance to remain within the 10 percent limitation. In addition to this amount, the Farm is also required to pay back 33.3 percent of the remaining balance, or 37 acre-feet ($111 \text{ acre-feet} \times 0.33 = 37 \text{ acre-feet}$), during the first year of payback, bringing the Farm's total CY 2013 payback obligation to 379 acre-feet. The remaining overrun balance of 74 acre-feet is required to be paid back in the subsequent 2 years as follows: 37 acre-feet in CY 2014 and 37 acre-feet in CY 2015.

In recent weeks, Reclamation has engaged in discussions with Mr. Youmans regarding the subject overrun. Through these discussions, Mr. Youmans informed Reclamation of the intent to install a flow measurement device on the pump that services the Farm. Reclamation appreciates

this proactive effort, and believes it will result in a more accurate calculation of the Farm's annual diversions.

Should the Farm need assistance in developing its payback plan, or have questions regarding the IOPP or the Farm's overrun and payback obligation, please contact Mr. Paul J. Matuska, Water Accounting and Verification Group Manager, at 702-293-8164.

Sincerely,



Steven C. Hvinden
Chief, Boulder Canyon Operations Office

Enclosure

cc: Mr. Christopher Harris
Acting Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035
(w/o encl)

Ms. Sandra A. Fabritz-Whitney
Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012-2105
(w/o encl)

Ms. Jayne Harkins
Executive Director
Colorado River Commission of
Nevada
555 East Washington Avenue, Suite 3100
Las Vegas, NV 89101-1065
(w/o encl)

Mr. Ray Griffin
P.O. Box 1769
Somerton, AZ 85350
(w/ encl)

Memo

To: Paul Matuska
From: Raymond Griffin
Date: 08/09/12

MILITARY OFFICE COPY RECEIPT		
REPLY DATE: 08/13/12		
DAY	INITIALS	CODE
8/14	[initials]	4200
CLASSIFICATION		
PROJECT		
CONFIDENTIAL		
FOUR-DIGIT		
KEYWORD		

Re-submitting proposal for overrun payback for Beattie Farms SW

BEATTIE FARMS SOUTHWEST
INADVERTENT OVERRUN AND PAYBACK POLICY (IOPP)
PAYBACK PLAN for CALENDAR YEARS 2013-2015

1. Cause of Inadvertent Overrun

As reported in the *Colorado River Accounting and Water Use Report Arizona, California, and Nevada, Calendar Year 2011*, the Farm incurred an overrun in the amount of 453 acre-feet. The cause of the overrun was unmetered irrigation use.

2. IOPP Conservation Measure(s) that will be Implemented to Pay Back the Overrun

The Farm will implement a 3-year fallowing program during calendar years 2013-2015 to meet its IOPP payback obligation. To conserve the required payback amount, a total of 91.19 acres will be taken out of production in accordance with the schedule outlined in Table 1. In the absence of this payback obligation the Farm would have irrigated these lands.

In addition to the fallowing program, and in response to the Farm's overrun, the Farm will implement a soil-amendment program on the fields not included in the fallowing program. Bactifeed, an additive designed to reduce water requirements, is advertised to reduce the number of irrigation cycles required for an annual crop by one. As this is a new practice being tested by the Farm, the water conservation potential is not yet known.

3. Location and Schedule of Fallowing with Amount of Water Conserved

The locations of the fields that will be fallowed are shown on the attached map (Attachment 1). Specifically, the Farm will fallow blocks 369-373, 375, 376, and 380 for a total of 76.28 acres in 2013; blocks 369 and 380 for a total of 8.91 acres in 2014; and block 380 for a total of 6 acres in 2015. Historically, and in the absence of a payback obligation, these fields would be farmed in alfalfa. Based on an application rate of 5 acre-feet/acre (a conservative estimate) the Farm projects that this fallowing program will conserve 381 acre-feet in 2013; 44.55 acre-feet in 2014; and 30 acre-feet in 2015, for a total conservation yield of 455 acre-feet (Table 1). Implementation of this plan will achieve the Farm's payback obligation of 453 acre-feet.

4. Monitoring and Verifying IOPP Conservation Measure

The Farm has purchased and installed a flow meter on its diversion pump, and beginning with August of 2012 will report monthly diversions to Reclamation. These diversion records will be made available for inspection at any time upon reasonable notice. In addition, Reclamation will perform satellite and field verification to ensure that the fields remain fallow during the period outlined in this Plan.

If, upon verification, it is determined that the following program outlined in this Plan results in greater than anticipated actual water conservation in calendar years 2013 and/or 2014, the Farm requests that this additional conservation be applied towards the Farm's remaining payback obligation.

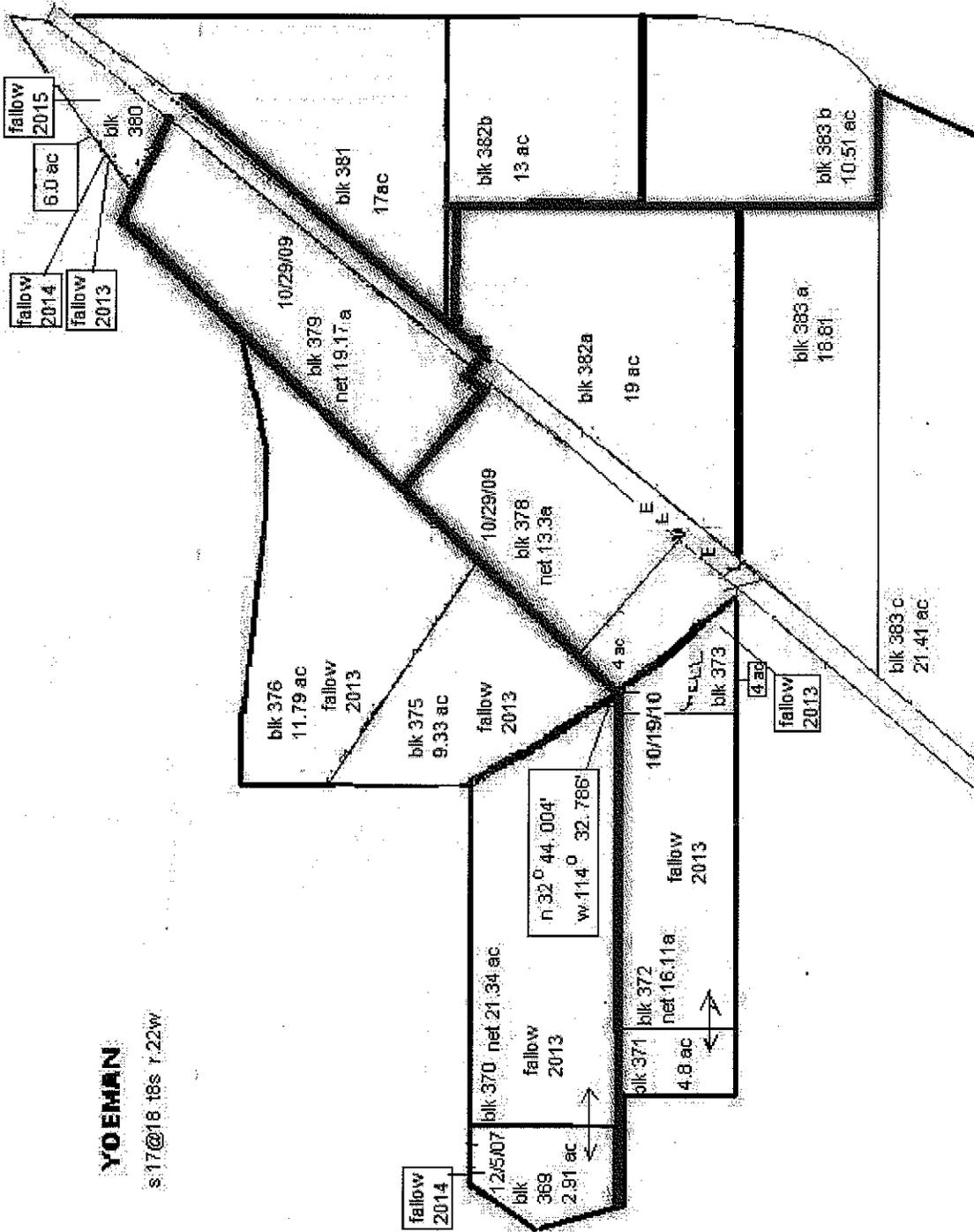
Table 1. Beattie Farms Payback Schedule, 2013-2015.

Year	Field/ Block #	Acres	Acre- feet/Acre	Acre-feet Conserved
2013				
	369	2.91	5	14.55
	370	21.34	5	106.7
	371	4.80	5	24
	372	16.11	5	80.55
	373	4.00	5	20
	375	9.33	5	46.65
	376	11.79	5	58.95
	380	6.00	5	30
Total 2013		76.28		381.4
2014				
	369	2.91	5	14.55
	380	6.00	5	30
Total 2014		8.91		44.55
2015				
	380	6.00	5	30
Total 2015		6.00		30
Total 2013-2015		91.19		455.95


 Raymond Griffin, President
 Griffin Ranches, Inc.

YOEMAN

s.17@18 t8s r.22w



YOEMAN CROP HISTORY

YEAR	BLK	CROP
2008	370-373	ALFALFA
2008	369,375-380	WHEAT
2009	369-373	WHEAT-MILO
2010	369-373	WHEAT
2010	375-380	ALFALFA
2010	381-382	WHEAT -CELERY
2010	383	ALFALFA
2011	369-380	ALFALFA
2011	381-382	WHEAT-CELERY
2011	383	ALFALFA
2012	369-380	ALFALFA
2012	381-382	WHEAT-CELERY
2012	383	ALFALFA



United States Department of the Interior

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

IN REPLY REFER TO:

LC-4220
WTR-4.03

DEC 31 2012

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1076 Highway P
O'Fallon, MO 63366

Subject: Approval of Inadvertent Overrun and Payback Policy (IOPP) Payback Plan for
Calendar Years 2013-2015 – Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the IOPP established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In accordance with the IOPP, and in response to the Bureau of Reclamation's letter dated June 22, 2012, Griffin Ranches, Inc., on behalf of the Farm, submitted an IOPP Payback Plan (Plan) dated August 9, 2012. This Plan defines a 3-year fallowing program, which will be implemented during calendar years 2013 through 2015, to conserve the amount of water necessary to meet the Farm's 453 acre-foot payback obligation.

The Inadvertent Overrun and Payback Technical Committee (IOPTC) reviewed the Plan, and recommended its adequacy on September 11, 2012. Taking into consideration the recommendation of the IOPTC, I make the final determination that the Plan adequately meets the requirements of the IOPP and approve the Plan for implementation during calendar years 2013-2015.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation will utilize quarterly field inspections on 100 percent of the fallowed acres and other methods, including analysis of satellite imagery, to verify the Farm has implemented the fallowing program in accordance with its approved Plan.

Reclamation's administration of the IOPP requires that each year the Farm submit a report certifying the amount of Colorado River water conserved by implementation of the extraordinary

conservation measures in the previous calendar year as defined in the approved Plan. Please submit the first of these three reports, certifying the amount of conservation achieved in calendar year 2013, to Reclamation no later than February 28, 2014.

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

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035

Ms. Sandra Fabritz-Whitney
Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012-2105

Ms. Jayne Harkins, P.E.
Executive Director
Colorado River Commission of
Nevada
555 East Washington Avenue, Suite 3100
Las Vegas, NV 89101-1065

Mr. Ray Griffin
P.O. Box 1769
Somerton, AZ 85350



United States Department of the Interior

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

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LC-4220
WTR-4.03

JUN 07 2013

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330-1121

Mr. Richard Prinster
Beattie Farms Southwest
1076 Highway P
O'Fallon, MO 63366-1014

Subject: Notice of Calendar Year (CY) 2012 Overrun of Colorado River Entitlement by Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) established requirements for payback of any inadvertent overuse of Colorado River water by users in the Lower Division States. In accordance with the IOPP, this letter informs you that the Bureau of Reclamation's final water accounting records for CY 2012 document that the Farm incurred an overrun of 235 acre-feet.

An overrun governed by the IOPP occurs when an entitlement holder inadvertently diverts, pumps, or receives Colorado River water in excess of the water user's entitlement for that year. Under Contract No. 05-XX-30-W0446, the Farm is entitled to divert up to 1,110 acre-feet per year for use within the Farm's contract service area. As published in the *Colorado River Accounting and Water Use Report Arizona, California, and Nevada Calendar Year 2012*, the Farm diverted 1,345 acre-feet in CY 2012, thereby exceeding its annual entitlement by 235 acre-feet.

An entitlement holder incurring an inadvertent overrun is required to submit a payback plan to Reclamation that demonstrates how the entitlement holder will intentionally forbear use of Colorado River water by implementing extraordinary conservation measures sufficient to meet its payback obligation. For overruns incurred in CY 2012, an entitlement holder must submit a payback plan to Reclamation by July 8, 2013. An entitlement holder's payback plan must describe:

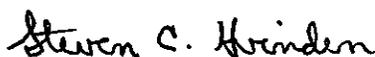
- a. The cause of the overrun.
- b. The extraordinary conservation measure(s) that will be implemented to pay back the overrun.

- c. The schedule, location, and amount of water that will be conserved by the payback measure(s), and information that adequately demonstrates that the proposed payback measure(s) is: (1) in addition to measure(s) being implemented to conserve water in accordance with any existing water transfer agreements, water conservation agreements, or Intentionally Created Surplus Plans of Creation, and (2) in addition to the measures implemented in any Reclamation-approved water conservation plan.
- d. How the payback measure(s) being implemented will meet the payback obligation.
- e. The amount of Colorado River water that will be conserved and/or supplemented by the payback measure(s) being implemented, for each year in the case of 3-year payback plans.
- f. The method(s) by which Reclamation will be able to monitor the implementation of the payback plan and verify the amount of payback.

In accordance with Section 2.3 of the IOPP, payback of the Farm's CY 2012 overrun will begin in CY 2014. The number of years within which an overrun must be paid back, and the minimum payback amount required in each year are defined in Section 2.6 of the IOPP. The Farm's payback for the CY 2012 overrun is governed by Section 2.6.d. of the IOPP, which provides for a 1-year payback schedule. Therefore, the Farm's CY 2012 overrun amount of 235 acre-feet must be repaid in full in CY 2014. This required payback is in addition to any other payback requirements the Farm may have in CY 2014.

Should the Farm need assistance in developing its payback plan, or have questions regarding the IOPP or the Farm's overrun and payback obligation, please contact Mr. Paul J. Matuska, Water Accounting and Verification Group Manager, at 702-293-8164.

Sincerely,



Steven C. Hvinden
Chief, Boulder Canyon Operations Office

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035

Ms. Sandra A. Fabritz-Whitney
Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012-2105

Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada
555 East Washington Avenue, Suite 3100
Las Vegas, NV 89101-1065

Mr. Ray Griffin
P.O. Box 1769
Somerton, AZ 85350-1769

BEATTIE FARMS SOUTHWEST
INADVERTENT OVERRUN AND PAYBACK POLICY (IOPP)
PAYBACK PLAN for CALENDAR YEARS 2014

1. Cause of Inadvertent Overrun

As reported in the *Colorado River Accounting and Water Use Report Arizona, California, and Nevada, Calendar Year 2012*, the Farm incurred an overrun in the amount of 235 acre-feet. Prior to July, 2012, the Farm's diversions were unmetered, and this was the cause of the overrun. In July 2012, the Farm installed a meter and has since been measuring and reporting its diversions on a monthly basis.

2. IOPP Conservation Measure(s) that will be Implemented to Pay Back the Overrun

To meet the Farm's IOPP payback obligation for its 2012 overrun (235 acre-feet), the Farm will implement a fallowing program in which 46.25 acres will be taken out of production in calendar year 2014. This acreage is in addition to the 8.91 acres the Farm will take out of production in 2014 to meet the Farm's IOPP payback obligation for its 2011 overrun (37 acre-feet), in accordance with the Farm's approved payback plan (Attachment #2). In the absence of this payback obligation the Farm would have irrigated these lands.

3. Location and Schedule of Fallowing with Amount of Water Conserved

The locations of the fields that will be fallowed are shown on the attached map (Attachment #1). Specifically, to meet the Farm's total 2014 payback obligation of 272 acre-feet, the Farm will fallow blocks 369-373 and 380 for a total of 55.16 acres. Historically, and in the absence of a payback obligation, these fields would be farmed in alfalfa. Based on an application rate of 5 acre-feet/acre (a conservative estimate) the Farm projects that this fallowing program will conserve 275.8 acre-feet (Table 1). Implementation of this plan will achieve the Farm's total 2014 payback obligation of 272 acre-feet.

Table 1. Beattie Farms Payback Schedule, 2014

Year	Field/Block #	Acres	Acre-foot/Acre	Acre-feet Conserved
2014				
	369*	2.91	5	14.55
	370	21.34	5	106.7
	371	4.80	5	24
	372	16.11	5	80.55
	373	4.00	5	20
	380*	6.00	5	30
Total 2014		55.16		275.8

*These fields are being fallowed to meet the Farm's 2014 payback obligation for its 2011 overrun.

4. Monitoring and Verifying IOPP Conservation Measure

The Farm will continue to monitor monthly diversions to ensure it meets its 2014 payback obligation. In addition, Reclamation will perform satellite and field verification to ensure that the fields remain fallow during the period outlined in this Plan.

- If, upon verification, it is determined that the following program outlined in this Plan results in greater than anticipated actual water conservation, the Farm requests that this additional conservation be applied towards the Farm's remaining payback obligation.

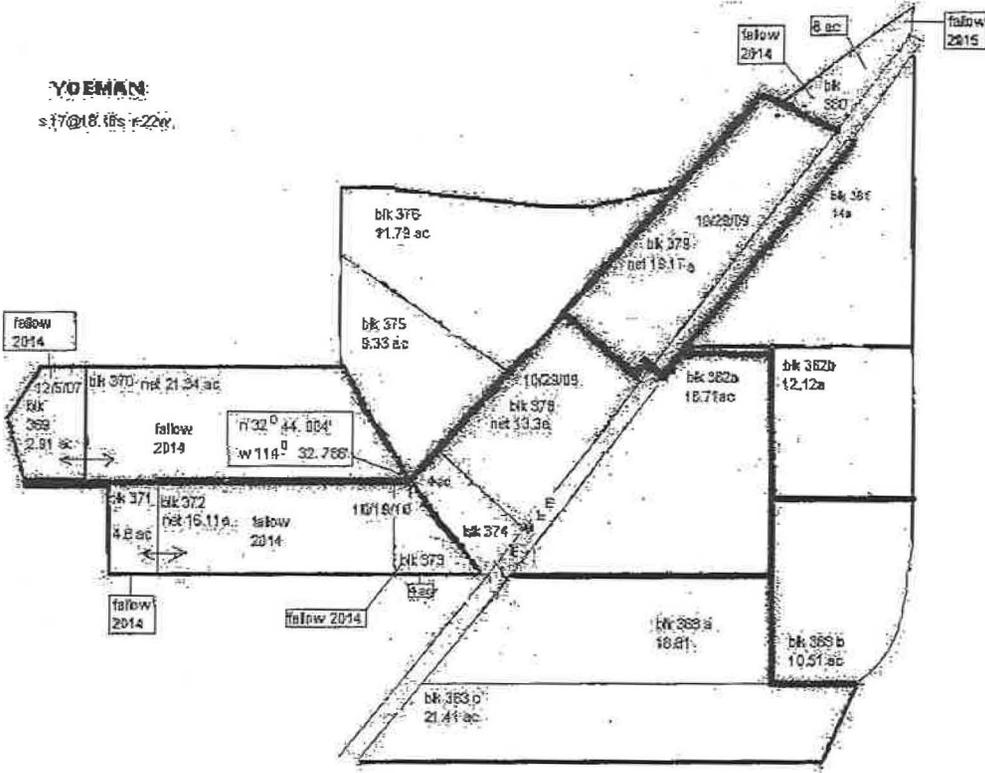

Raymond Griffin, President
Griffin Ranches, Inc.

YOEMAN CROP HISTORY			
YEAR	BLK	CROP	
2008	370-373	ALFALFA	
2008	369,375-380	WHEAT	
2009	369-373	WHEAT-MILO	
2010	369-373	WHEAT	
2010	375-380	ALFALFA	
2010	381-382	WHEAT-CELERY	
2010	383	ALFALFA	
2011	369-380	ALFALFA	
2011	381-382	WHEAT-CELERY	
2011	383	ALFALFA	
2012	369-380	ALFALFA	
2012	381-382	WHEAT-CELERY	
2012	383	ALFALFA	
2013	369-373	FALLOW	
2013	375-376	FALLOW	
2013	374	ONION SEED	
2013	378,379,-383A,B,-C	ALFALFA	
2013	381-382	CELERY - SUDAN	

Attachment #1

YOEMAN

s:17@10 lbs r:22cr



FALLOW FOR 2014 55.16 AC

FALLOW FOR 2015 6AC

BEATTIE FARMS SOUTHWEST
INADVERTENT OVERRUN AND PAYBACK POLICY (IOPP)
PAYBACK PLAN for CALENDAR YEARS 2013-2015

1. Cause of Inadvertent Overrun

As reported in the *Colorado River Accounting and Water Use Report Arizona, California, and Nevada, Calendar Year 2011*, the Farm incurred an overrun in the amount of 453 acre-feet. The cause of the overrun was unmetered irrigation use.

2. IOPP Conservation Measure(s) that will be Implemented to Pay Back the Overrun

The Farm will implement a 3-year fallowing program during calendar years 2013-2015 to meet its IOPP payback obligation. To conserve the required payback amount, a total of 91.19 acres will be taken out of production in accordance with the schedule outlined in Table 1. In the absence of this payback obligation the Farm would have irrigated these lands.

In addition to the fallowing program, and in response to the Farm's overrun, the Farm will implement a soil-amendment program on the fields not included in the fallowing program. Bactifeed, an additive designed to reduce water requirements, is advertised to reduce the number of irrigation cycles required for an annual crop by one. As this is a new practice being tested by the Farm, the water conservation potential is not yet known.

3. Location and Schedule of Fallowing with Amount of Water Conserved

The locations of the fields that will be fallowed are shown on the attached map (Attachment 1). Specifically, the Farm will fallow blocks 369-373, 375, 376, and 380 for a total of 76.28 acres in 2013; blocks 369 and 380 for a total of 8.91 acres in 2014; and block 380 for a total of 6 acres in 2015. Historically, and in the absence of a payback obligation, these fields would be farmed in alfalfa. Based on an application rate of 5 acre-feet/acre (a conservative estimate) the Farm projects that this fallowing program will conserve 381 acre-feet in 2013; 44.55 acre-feet in 2014; and 30 acre-feet in 2015, for a total conservation yield of 455 acre-feet (Table 1). Implementation of this plan will achieve the Farm's payback obligation of 453 acre-feet.

4. Monitoring and Verifying IOPP Conservation Measure

The Farm has purchased and installed a flow meter on its diversion pump, and beginning with August of 2012 will report monthly diversions to Reclamation. These diversion records will be made available for inspection at any time upon reasonable notice. In addition, Reclamation will perform satellite and field verification to ensure that the fields remain fallow during the period outlined in this Plan.

If, upon verification, it is determined that the following program outlined in this Plan results in greater than anticipated actual water conservation in calendar years 2013 and/or 2014, the Farm requests that this additional conservation be applied towards the Farm's remaining payback obligation.

Table 1. Beattie Farms Payback Schedule, 2013-2015.

Year	Field/Block #	Acres	Acre-feet/Acre	Acre-feet Conserved
2013				
	369	2.91	5	14.55
	370	21.34	5	106.7
	371	4.80	5	24
	372	16.11	5	80.55
	373	4.00	5	20
	375	9.33	5	46.65
	376	11.79	5	58.95
	380	6.00	5	30
Total 2013		76.28		381.4

Year	Field/Block #	Acres	Acre-feet/Acre	Acre-feet Conserved
2014				
	369	2.91	5	14.55
	380	6.00	5	30
Total 2014		8.91		44.55

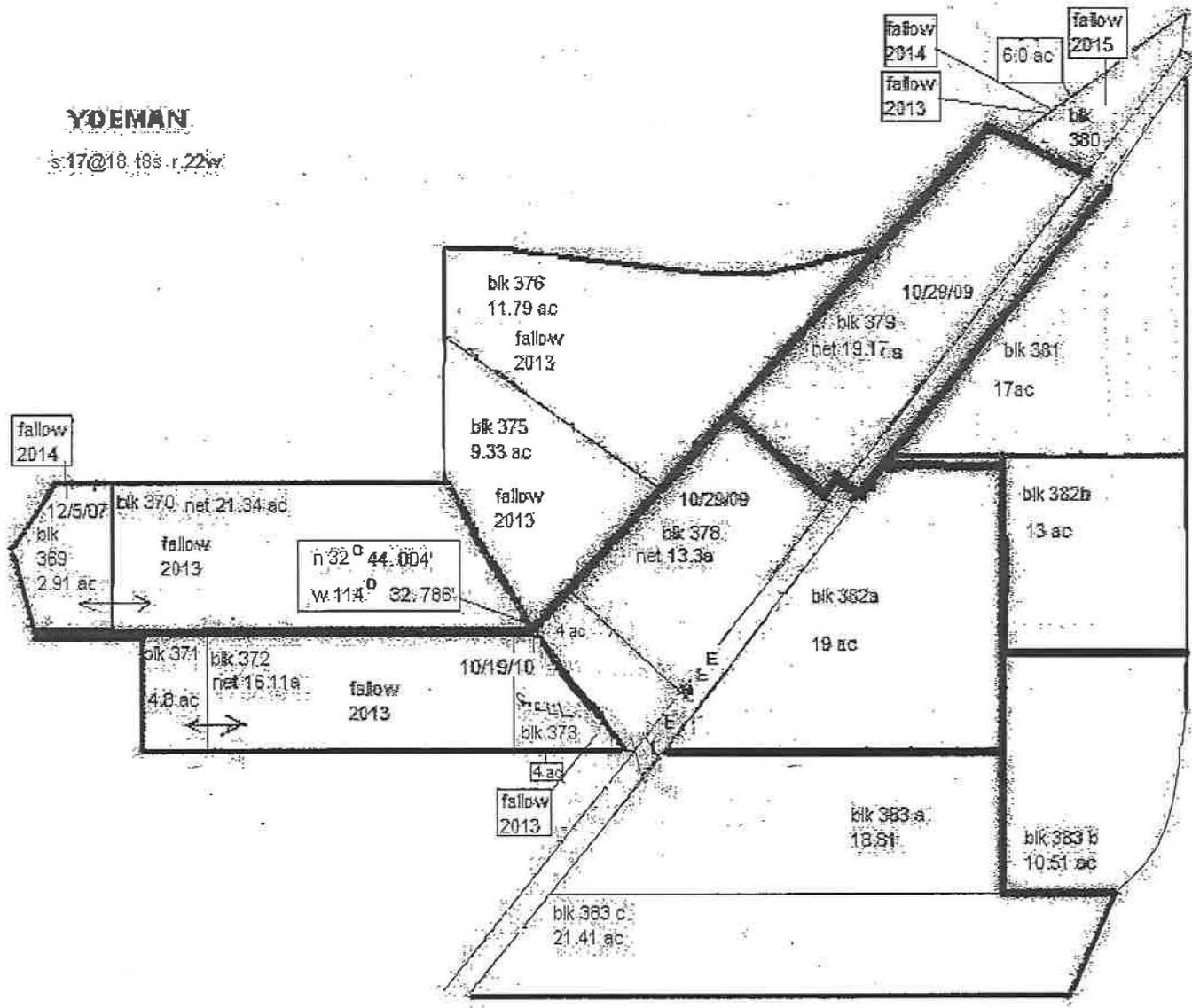
Year	Field/Block #	Acres	Acre-feet/Acre	Acre-feet Conserved
2015				
	380	6.00	5	30
Total 2015		6.00		30

Total 2013-2015		81.19		455.95
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 Raymond Griffin, President
 Griffin Ranches, Inc.

YDEMAN

s.17@18.18s r.22w



YOEMAN CROP HISTORY			
YEAR	BLK	CROP	
2008	370-373	ALFALFA	
2008	369,375-380	WHEAT	
2009	369-373	WHEAT-MILO	
2010	369-373	WHEAT	
2010	375-380	ALFALFA	
2010	381-382	WHEAT-CELERY	
2010	383	ALFALFA	
2011	369-380	ALFALFA	
2011	381-382	WHEAT-CELERY	
2011	383	ALFALFA	
2012	369-380	ALFALFA	
2012	381-382	WHEAT-CELERY	
2012	383	ALFALFA	



United States Department of the Interior

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IN REPLY REFER TO:

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WTR-4.03

SEP 21 2013

CERTIFIED – RETURN RECEIPT REQUESTED

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3025 North West Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1076 Highway P
O'Fallon, MO 63366

Subject: Approval of Inadvertent Overrun and Payback Policy (IOPP) Payback Plan for
Calendar Year 2014 – Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the IOPP established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. By letter dated June 7, 2013, the Bureau of Reclamation notified the Farm that based on Reclamation's final water accounting records for calendar year 2012, the Farm incurred an overrun of 235 acre-feet in 2012. In accordance with the IOPP, the Farm is required to pay back the full amount of its 2012 overrun in calendar year 2014.

In response to Reclamation's June 7 letter, and in accordance with the IOPP, Griffin Ranches, Inc., on behalf of the Farm, submitted an IOPP Payback Plan (Plan) on August 15, 2013. As outlined in that Plan, the Farm will implement a fallowing program in calendar year 2014 in which 46.25 acres will be taken out of agricultural production to conserve the amount of water necessary to meet the Farm's payback obligation for its 2012 overrun. This acreage is in addition to the 8.91 acres the Farm will take out of production in 2014 to meet the Farm's IOPP payback obligation for its 2011 overrun.¹ Implementation of the Plan is anticipated to conserve 276 acre-feet, which will meet the Farm's total 2014 payback obligation amount of 272 acre-feet (235 acre-feet for its 2012 overrun and 37 acre-feet for its 2011 overrun).

On August 21, 2013, the Inadvertent Overrun and Payback Technical Committee (IOPTC) reviewed the Plan for technical adequacy and unanimously recommended its approval. Taking

¹The Farm incurred an overrun in 2011, for which a payback in the amount of 37 acre-feet is required in calendar year 2014. By letter dated December 31, 2012, Reclamation approved the Farm to fallow 8.91 acres in 2014 to meet the 37 acre-foot payback obligation.

into consideration the recommendation of the IOPTC, I make the final determination that the Farm's Plan adequately meets the requirements of the IOPP and approve the Plan for implementation during calendar year 2014.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation will utilize quarterly field inspections on 100 percent of the fallowed acres and other methods, including analysis of satellite imagery, to verify the Farm has implemented the following program in accordance with its approved Plan.

Reclamation's administration of the IOPP requires that each year the Farm submit a report certifying the amount of Colorado River water conserved by implementation of the extraordinary conservation measures in the previous calendar year as defined in Farm's approved Plan. Please submit a report, certifying the amount of conservation achieved in calendar year 2014, to Reclamation no later than February 28, 2015.

Thank you for submitting the Farm's IOPP Payback Plan. If you have questions, please contact Mr. Paul Matuska, Water Accounting and Verification Group Manager, at 702-293-8164.

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035

Ms. Sandra Fabritz-Whitney
Director
Arizona Department of Water Resources
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Jayne Harkins, P.E.
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Mr. Ray Griffin
Griffin Ranches, Inc.
P.O. Box 1769
Somerton, AZ 85350

BEATTIE FARMS SOUTHWEST (FARM)
INADVERTENT OVERRUN AND PAYBACK POLICY (IOPP)
Certification Report for CALENDAR YEAR 2013

1. Cause of Inadvertent Overrun

As reported in the *Colorado River Accounting and Water Use Report Arizona, California, and Nevada, Calendar Year 2011* the Farm incurred an overrun in the amount of 453 acre-feet in 2011. Prior to July 2012, the Farm's diversions were unmetered, and this was the cause of the overrun. In July 2012, the Farm installed a meter and has since been measuring and reporting its diversions on a monthly basis.

In accordance with the IOPP, and in response to the Bureau of Reclamation's letter dated June 22, 2012, Griffin Ranches, Inc. submitted an IOPP Payback Plan (Plan) dated August 9, 2012. This Plan defined a 3-year fallowing program, to be implemented during calendar years 2013-2015, to conserve the amount of water necessary to meet the Farm's 453 acre-foot payback obligation. After consulting with the Inadvertent Overrun and Payback Technical Committee, Reclamation approved the Farm's Plan by letter dated December 31, 2012.

2. Conservation Measure(s) implemented in Calendar Year 2013 to Meet the Farm's Required Payback Obligation

The Farm was required to pay back a minimum of 379 acre-feet in calendar year 2013. As outlined in its approved Plan, the Farm fallowed a total of 76.28 acres from January - December 2013 in order to meet the Farm's payback obligation. Based on an application rate of 5 acre-feet per acre, it was anticipated that by fallowing this acreage, the Farm would conserve 381.4 acre-feet in 2013, which would meet its 2013 obligation.

Records of the Farm's diversions through June 2013 combined with projected diversions for the remainder of the year indicated that the Farm was in danger of slightly exceeding its adjusted entitlement of 731 acre-feet. To ensure the Farm met its 2013 payback obligation, the Farm fallowed an additional 72.69 acres beginning July 1, 2013 through December 31, 2013 (see Table 1 and Attachment #1). From July 1 through December 31, 2013, blocks 378, 379, 383a and 383c, a total of 72.69 acres, were fallowed which resulted in the 1.24 acre-feet per block savings (91 acre-feet saved divided by 72.69 acres = 1.24 acre feet).

3. Location and Schedule of Fallowing with Amount of Water Conserved

The locations of the fields that were fallowed are shown in Table 1 and on the attached map (Attachment #1). Historically, and in the absence of a payback obligation, these fields would be farmed in alfalfa.

Table 1. Beattie Farms Fallowed Fields and Conservation, Calendar Year 2013.

Year	Field/ Block #	Acres	Acre-feet/Acre	Acre-feet Conserved
2013				
Original	369	2.91	5	14.55
	370	21.34	5	106.7
	371	4.80	5	24
	372	16.11	5	80.55
	373	4.00	5	20
	375	9.33	5	46.65
	376	11.79	5	58.95
	380	6.00	5	30
	Subtotal	76.28		381.40
Additional*	378	13.30	1.24	16.49
	379	19.17	1.24	23.77
	383A	18.81	1.24	23.32
	383C	21.41	1.24	26.55
	Subtotal	72.69		90.14
Total 2013**		149		472

*Additional fallowing performed from July 1 - December 31, 2013.

**Rounded to the nearest acre-foot.

4. Monitoring and Verifying IOPP Conservation Measure

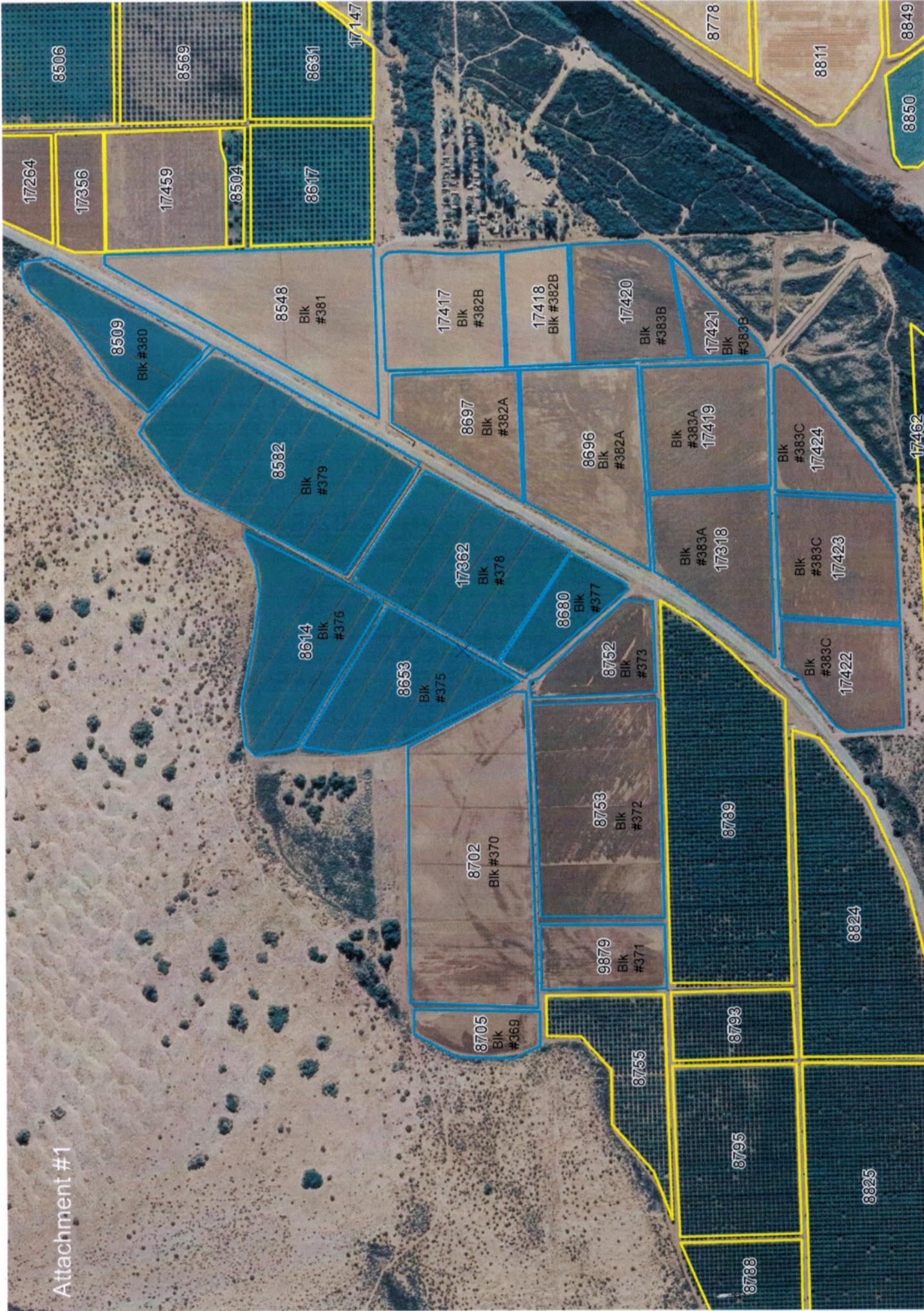
The Farm continued to monitor its diversions in 2013 and, as noted above, made appropriate adjustments to ensure its conservation targets were being achieved through its fallowing program. During calendar year 2013, the Farm diverted 638 acre-feet, which is 472 acre-feet below its 1,110 acre-foot entitlement, and 93 acre-feet below its 2013 adjusted entitlement of 731 acre-feet.

The Bureau of Reclamation performed quarterly field verification inspections on the fields outlined in the Farm's approved Plan to confirm that the fields remained fallow during the entire period. For those fields added to the program beginning July 1, the Farm proposes that satellite imagery be used to provide the required verification.

Based on the information provided above and the Farm's 2013 diversion of 638 acre-feet, the Farm certifies that it has conserved a total of 472 acre-feet in calendar year 2013 as a result of the extraordinary conservation measures implemented by the Farm. Therefore, the Farm requests that 379 acre-feet be applied towards the Farm's 2013 payback obligation, and the remaining 93 acre-feet be applied as early payback toward the Farm's 2013 obligation.


 Raymond Griffin, President
 Griffin Ranches, Inc.

Attachment #1





United States Department of the Interior

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

IN REPLY REFER TO:

LC-4220
WTR-4.03

MAY 05 2014

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1076 Highway P
O'Fallon, MO 63366

Subject: Verification of 2013 Inadvertent Overrun Payback by Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In calendar year 2011, the Farm incurred an overrun in the amount of 453 acre-feet (af). In accordance with the IOPP, Griffin Ranches, Inc., on behalf of the Farm, submitted an IOPP Payback Plan (Payback Plan) in which the Farm outlined a fallowing program to pay back a minimum of 379 af of the Farm's 2011 overrun in 2013. By letter dated December 31, 2012, the Bureau of Reclamation approved the Farm's Payback Plan.

By email dated April 7, 2014, the Farm submitted a report (IOPP certification report) certifying the extraordinary conservation measure implemented by the Farm in 2013 and the amount of Colorado River water conserved for purposes of meeting the Farm's 2013 payback obligation. As outlined in the Farm's IOPP certification report, the Farm fallowed 76.28 acres from January through December 2013, and an additional 72.69 acres from July through December 2013. The Farm certified that through implementation of this fallowing it conserved 472 af of Colorado River water in 2013. The Farm requested that, of the 472 af, 379 af be applied towards the Farm's 2013 payback obligation, and the remaining 93 af be applied as early payback toward the Farm's 2014 obligation¹.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation conducted quarterly independent field verification inspections in 2013 and analyzed satellite imagery to verify the fallowing implemented by the Farm. The findings of Reclamation's verification analysis are included in the enclosed report, *Beattie Farms Southwest Inadvertent Overrun and Payback Policy 2013 Verification Report*.

¹In addition to the Farm's 2011 overrun of 453 af, the Farm had a 235 af overrun in 2012. In accordance with the IOPP, the Farm's payback schedule required the Farm to repay 37 af of its 2011 overrun, and all of its 2012 overrun (235 af) in 2014. Thus, the Farm's required payback amount in 2014 is 272 af.

The Inadvertent Overrun and Payback Technical Committee (IOPTC) met on April 10, 2014, to review the Farm's 2013 IOPP certification report and to make a recommendation regarding the adequacy of the report in demonstrating the achieved payback amount. The IOPTC unanimously recommended the Farm be credited with 472 af of payback for 2013. In its recommendation, the IOPTC acknowledged that, of the total payback, 379 af should be credited towards the Farm's 2013 payback obligation, and 93 af be credited as early payback towards the Farm's 2014 payback obligation.

Taking into consideration the recommendations provided by the IOPTC members, Reclamation's independent verification, and other information, I verify and make the final determination that the Farm conserved 472 af of Colorado River water during 2013 as documented in the Farm's 2013 IOPP certification report, and therefore credit the Farm with this amount of payback for 2013. Additionally, I approve the Farm's request that, of this amount, Reclamation apply 379 af to the Farm's 2013 payback obligation and 93 af as early payback toward the Farm's 2014 payback obligation. Applying the 93 af of early payback reduces the Farm's 2014 payback obligation to 179 af and the Farm's total outstanding overrun balance to 216 af. Reclamation appreciates the Farm's effort to provide payback in advance of its established payback schedule.

If you have questions, please contact Mr. Paul Matuska, Water Accounting and Verification Group Manager, at 702-293-8164 or pmatuska@usbr.gov.

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

Enclosure

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035

Mr. Michael J. Lacey
Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012-2105

Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada
555 East Washington Avenue, Suite 3100
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(w/o encl to each)

Mr. Ray Griffin
P.O. Box 1769
Somerton, AZ 85350



United States Department of the Interior

BUREAU OF RECLAMATION
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Boulder City, NV 89006-1470

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DEC 03 2014

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1551 Mammoth Drive
O'Fallon, MO 63366

Subject: Notification of Risk of Exceeding 2014 Adjusted Entitlement by Beattie Farms
Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) establishes requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In accordance with the IOPP, this letter provides the Farm with notification that the Bureau of Reclamation's projection as of November 17, 2014, indicates that the Farm's diversion of Colorado River water may exceed the Farm's adjusted Colorado River water entitlement for calendar year 2014.

As noted in Reclamation's letter dated May 5, 2014 (copy enclosed), the Farm is required to pay back a minimum of 179 acre-feet (AF) of Colorado River water in 2014 for overruns incurred by the Farm during calendar years 2011 and 2012. Taking into consideration this payback obligation, the Farm's adjusted entitlement for 2014 is 931 AF. Based on the Farm's reported Colorado River diversions through October 2014 and the Farm's projected diversions for the months of November and December 2014 as provided by Mr. Ray Griffin via email dated November 17, 2014, Reclamation projects that the Farm may overrun its adjusted entitlement by 88 AF.

I remind you that should the Farm's actual calendar year 2014 diversion exceed its adjusted entitlement, Reclamation will be required, in accordance with Section 2.9 of the IOPP, to begin enforcement proceedings and limit releases to the Farm in 2015 to ensure that by the end of 2015 the Farm has fully met its payback obligation.

If you have questions regarding the IOPP, or would like to discuss the Farm's projected 2014 diversion, please contact Mr. Paul Matuska, Manager, Water Accounting and Verification Group at 702-293-8164 or pmataska@usbr.gov.

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

Enclosure

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
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770 Fairmont Avenue, Suite 100
Glendale, CA 91203

Mr. Michael J. Lacey
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Arizona Department of Water Resources
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Mr. John Entsminger
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1001 South Valley View Boulevard
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Mr. Ray Griffin
President
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P.O. Box 1769
Somerton, AZ 85350
(w/encl to each)



United States Department of the Interior

Enclosure

BUREAU OF RECLAMATION
Lower Colorado Regional Office
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IN REPLY REFER TO:

LC-4220
WTR-4.03

MAY 05 2014

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1076 Highway P
O'Fallon, MO 63366

Subject: Verification of 2013 Inadvertent Overrun Payback by Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In calendar year 2011, the Farm incurred an overrun in the amount of 453 acre-feet (af). In accordance with the IOPP, Griffin Ranches, Inc., on behalf of the Farm, submitted an IOPP Payback Plan (Payback Plan) in which the Farm outlined a fallowing program to pay back a minimum of 379 af of the Farm's 2011 overrun in 2013. By letter dated December 31, 2012, the Bureau of Reclamation approved the Farm's Payback Plan.

By email dated April 7, 2014, the Farm submitted a report (IOPP certification report) certifying the extraordinary conservation measure implemented by the Farm in 2013 and the amount of Colorado River water conserved for purposes of meeting the Farm's 2013 payback obligation. As outlined in the Farm's IOPP certification report, the Farm fallowed 76.28 acres from January through December 2013, and an additional 72.69 acres from July through December 2013. The Farm certified that through implementation of this fallowing it conserved 472 af of Colorado River water in 2013. The Farm requested that, of the 472 af, 379 af be applied towards the Farm's 2013 payback obligation, and the remaining 93 af be applied as early payback toward the Farm's 2014 obligation¹.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation conducted quarterly independent field verification inspections in 2013 and analyzed satellite imagery to verify the fallowing implemented by the Farm. The findings of Reclamation's verification analysis are included in the enclosed report, *Beattie Farms Southwest Inadvertent Overrun and Payback Policy 2013 Verification Report*.

¹In addition to the Farm's 2011 overrun of 453 af, the Farm had a 235 af overrun in 2012. In accordance with the IOPP, the Farm's payback schedule required the Farm to repay 37 af of its 2011 overrun, and all of its 2012 overrun (235 af) in 2014. Thus, the Farm's required payback amount in 2014 is 272 af.

The Inadvertent Overrun and Payback Technical Committee (IOPTC) met on April 10, 2014, to review the Farm's 2013 IOPP certification report and to make a recommendation regarding the adequacy of the report in demonstrating the achieved payback amount. The IOPTC unanimously recommended the Farm be credited with 472 af of payback for 2013. In its recommendation, the IOPTC acknowledged that, of the total payback, 379 af should be credited towards the Farm's 2013 payback obligation, and 93 af be credited as early payback towards the Farm's 2014 payback obligation.

Taking into consideration the recommendations provided by the IOPTC members, Reclamation's independent verification, and other information, I verify and make the final determination that the Farm conserved 472 af of Colorado River water during 2013 as documented in the Farm's 2013 IOPP certification report, and therefore credit the Farm with this amount of payback for 2013. Additionally, I approve the Farm's request that, of this amount, Reclamation apply 379 af to the Farm's 2013 payback obligation and 93 af as early payback toward the Farm's 2014 payback obligation. Applying the 93 af of early payback reduces the Farm's 2014 payback obligation to 179 af and the Farm's total outstanding overrun balance to 216 af. Reclamation appreciates the Farm's effort to provide payback in advance of its established payback schedule.

If you have questions, please contact Mr. Paul Matuska, Water Accounting and Verification Group Manager, at 702-293-8164 or pmatuska@usbr.gov.

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

Enclosure

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035

Jayne Harkins, P.E.
Executive Director
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555 East Washington Avenue, Suite 3100
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Mr. Michael J. Lacey
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3550 North Central Avenue
Phoenix, AZ 85012-2105

Mr. Ray Griffin
P.O. Box 1769
Somerton, AZ 85350



United States Department of the Interior

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

IN REPLY REFER TO:

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WTR-4.03

FEB 12 2015

CERTIFIED - RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1551 Mammoth Drive
O'Fallon, MO 63366

Subject: Notification of Provisional Exceedance of 2014 Adjusted Entitlement by Beattie Farms Southwest (Farm) (Action by February 28, 2015)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) establishes requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In accordance with the IOPP, this letter informs you that the Bureau of Reclamation's provisional water accounting records indicate that the Farm exceeded its adjusted Colorado River water entitlement for calendar year 2014.

Under Contract No. 05-XX-30-W0446, the Farm is entitled to divert up to 1,110 acre-feet (AF) of Colorado River water per year for use within the Farm's contract service area. Pursuant to the terms of the IOPP, the Farm was required to pay back a minimum of 179 AF of Colorado River water in 2014 for overruns incurred by the Farm during calendar years 2011 and 2012. Therefore, the Farm's adjusted entitlement for 2014 was 931 AF.

Based on the Farm's reported Colorado River diversions for calendar year 2014, as provided by Mr. Ray Griffin, the Farm's total diversion was 1,000 AF, thereby exceeding the Farm's adjusted entitlement by 69 AF.¹ In accordance with the IOPP, the Farm is required to pay back the entire 69 AF in 2015. When combined with the Farm's existing 2015 IOPP payback obligation of 37 AF for its 2011 overrun, the Farm's total 2015 payback obligation becomes 106 AF. Taking into consideration this revised payback obligation, the Farm's adjusted entitlement for 2015 is 1,004 AF.

By letter dated December 31, 2012, Reclamation approved the Farm's IOPP Payback Plan for Calendar Years 2013-2015 (Plan) which defined a 3-year fallowing program to conserve the amount of Colorado

¹Values reported here are considered provisional until publication of Reclamation's *Colorado River Accounting and Water Use Report, Arizona, California, and Nevada Calendar Year 2014*.

River water necessary to meet the Farm's payback obligation for its 2011 overrun. As outlined in the Plan, the Farm will fallow 6 acres in 2015 to achieve an estimated conservation volume of 30 AF. Please submit a revised payback plan to Reclamation no later than February 28, 2015, outlining the additional extraordinary conservation measures the Farm will implement in 2015 to meet its 106 AF payback obligation, and other actions the Farm will take in 2015 to ensure the Farm does not exceed its adjusted entitlement.

Additionally, please include a schedule of monthly Colorado River diversions for calendar year 2015 with your revised payback plan. This schedule will be used by Reclamation to monitor and project diversions during 2015 in an effort to ensure the Farm does not exceed its adjusted entitlement. I remind you that, pursuant to Section 2.9 of the IOPP, should preliminary determinations indicate that sufficient extraordinary conservation or sufficient forbearance of Colorado River water is not projected to occur, Reclamation will notify the Farm of this projection in writing. Reclamation will consult with the Farm on a modified schedule, and will limit releases to the Farm in 2015 such that by the end of the year the Farm has fully met its payback obligation.

If you have questions, please contact Mr. Paul Matuska, Manager, Water Accounting and Verification Group at 702-293-8164 or pmatuska@usbr.gov.

Sincerely,

ACTING FOR



Terrance J. Fulp, Ph.D.
Regional Director

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203

Mr. Thomas Buschatzke
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Mr. Ray Griffin
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P.O. Box 1769
Somerton, AZ 85350

BEATTIE FARMS SOUTHWEST (FARM)
INADVERTENT OVERRUN AND PAYBACK POLICY (IOPP)
Certification Report for CALENDAR YEAR 2014

1. Cause of Inadvertent Overrun

As reported in the Bureau of Reclamation's *Colorado River Accounting and Water Use Report Arizona, California, and Nevada* for calendar years 2011 and 2012, the Farm incurred overruns in the amounts of 453 acre-feet (AF) and 235 AF, respectively. Prior to July 2012, the Farm's diversions were unmetered, and this was the cause of the overruns. In July 2012, the Farm installed a meter and has since been measuring and reporting its diversions on a monthly basis.

2. 2014 IOPP Payback Obligation

At the end of 2012, the Farm's total IOPP overrun balance was 688 AF. In accordance with the IOPP, the Farm was required to pay back 379 AF of this balance in 2013; 272 AF in 2014; and 37 AF in 2015. In 2013, however, the Farm successfully conserved 472 AF, or 93 AF more than its required 2013 obligation. The Farm applied the 93 AF towards its 2014 obligation, thereby reducing the Farm's 2014 payback obligation from 272 AF to 179 AF. This is demonstrated in the table below.

Table 1. Beattie Farms' original payback obligation schedule and revised payback schedule as of the end of Calendar Year 2013.

Year of Overrun	Overrun Amount	Original Payback Schedule				Revised Payback Schedule at the end of CY 2013*			
		Min Payback Volume 2013	Min Payback Volume 2014	Min Payback Volume 2015	Total Volume	Actual Payback Volume 2013	Revised Payback Volume 2014	Payback Volume 2015	Total Volume
2011	453	379	37	37		416	-	37	
2012	235	-	235	-		56	179		
Total	688	379	272	37	688	472	179	37	688

*In CY 2013, the Farm conserved a total of 472 AF. Of this amount, 379 AF was used to meet the Farm's original 2013 payback obligation; the remaining 93 AF was applied towards the Farm's total 2014 payback obligation amount of 272 AF, thereby reducing the Farm's 2014 obligation to 179 AF.

Based on the Farm's minimum payback obligation of 179 AF, the Farm's adjusted entitlement for 2014 was 931 AF.

3. Conservation Measure(s) implemented in Calendar Year 2014 to Meet the Farm's Required Payback Obligation

As noted above, the Farm was required to pay back a minimum of 179 AF in calendar year 2014. The Farm's approved Payback Plan for Calendar Year 2014 dated August 15, 2013, outlined a fallowing program in which the Farm would fallow 55.16 acres in 2014 in order to meet the Farm's payback obligation. Based on an application rate of 5 AF per acre, it was anticipated that by fallowing this acreage, the Farm would conserve approximately 276 AF. To ensure it met its 2014 payback obligation, the Farm made the decision to keep Blocks 374, 375, and 376 (an additional 26.83 acres) out of production for the entire year (i.e. January 1-December 31).

Due to unforeseen circumstances, more water was required to bring the Farm's celery crop (which was being produced on lands not subject to the fallowing program) to harvest than was originally estimated. Specifically, this was the first year the Farm produced a vegetable crop on fields that were historically planted in alfalfa, and the light soils required more frequent irrigation than anticipated. In an effort to keep the Farm's total diversion within the Farm's 2014 adjusted entitlement, the Farm implemented additional

measures and did not irrigate Blocks 378 and 379 (32.47 acres) from July 1, 2014 through December 31, 2014 to aid with conservation efforts. Despite these additional efforts, the Farm's total 2014 diversion was 1,000 AF.

4. Location and Schedule of Fallowing with Amount of Water Conserved

The specific fields that were fallowed by the Farm in 2014 in accordance with the Farm's approved IOPP Payback Plan are identified in Table 2, the locations of which may be viewed on the attached map (Attachment #1). Historically, and in the absence of a payback obligation, these fields would be farmed in alfalfa. The estimated conservation yield from fallowing these acres was approximately 276 AF. As noted above, the Farm also fallowed Blocks 374-376 for the entire year and did not irrigate Blocks 378 and 379 from July 1 – December 31, 2014. Based on the Farm's total diversion of 1,000 AF, however, the net conservation amount was 110 AF¹.

Table 2. Beattie Farms Fallowing, Calendar Year 2014.

Year	Field/ Block #	USBR Field #	Acres
2014			
2014 Payback Plan	369	8705	2.91
	370	8702	21.34
	371	9879	4.80
	372	8753	16.11
	373	8752	4.00
	380	8509	6.00
	Subtotal		55.16
Additional	374*	8680	4.84
	375*	8653	9.75
	376*	8614	12.24
	378**	17362	13.30
	379**	8582	19.17
	Subtotal		32.47
Total 2014			87.63

*Additional acreage left out of production from January 1 - December 31, 2014.

**Additional acreage fallowed July 1 - December 31, 2014.

incorrect values;
subtotal = 59.30 and
total 2014 = 114.46

5. Monitoring and Verifying IOPP Conservation Measures

The Farm continued to monitor its diversions in 2014 and, as noted above, made adjustments mid-year to try to limit its diversion to remain within its adjusted entitlement. The Farm's records of diversions for calendar year 2014, however, demonstrate that the Farm diverted 1,000 AF, which is 110 AF below its 1,110 AF entitlement, and 69 AF above its 2014 adjusted entitlement of 931 AF.

The Bureau of Reclamation performed quarterly field verification inspections on the fields outlined in the Farm's approved Plan to confirm that the fields remained fallow during the entire period.

Based on the information provided above and the Farm's 2014 diversion of 1,000 AF, the Farm certifies that its net conservation in 2014 was 110 AF. Therefore, the Farm requests that 110 AF be applied towards the Farm's 2014 payback obligation.



Raymond Griffin, President
Griffin Ranches, Inc.

¹Based on the Farm's Entitlement of 1,110 AF and the Farm's 2014 diversion of 1,000 AF, the net conservation achieved by the Farm = 110 AF.

Beattie Farms Southwest

IOPP Fallowing in 2014

-  Fallow All Year
-  Remained in Production
-  Fallow (Jul-Dec)
-  Beattie Farms Field ID

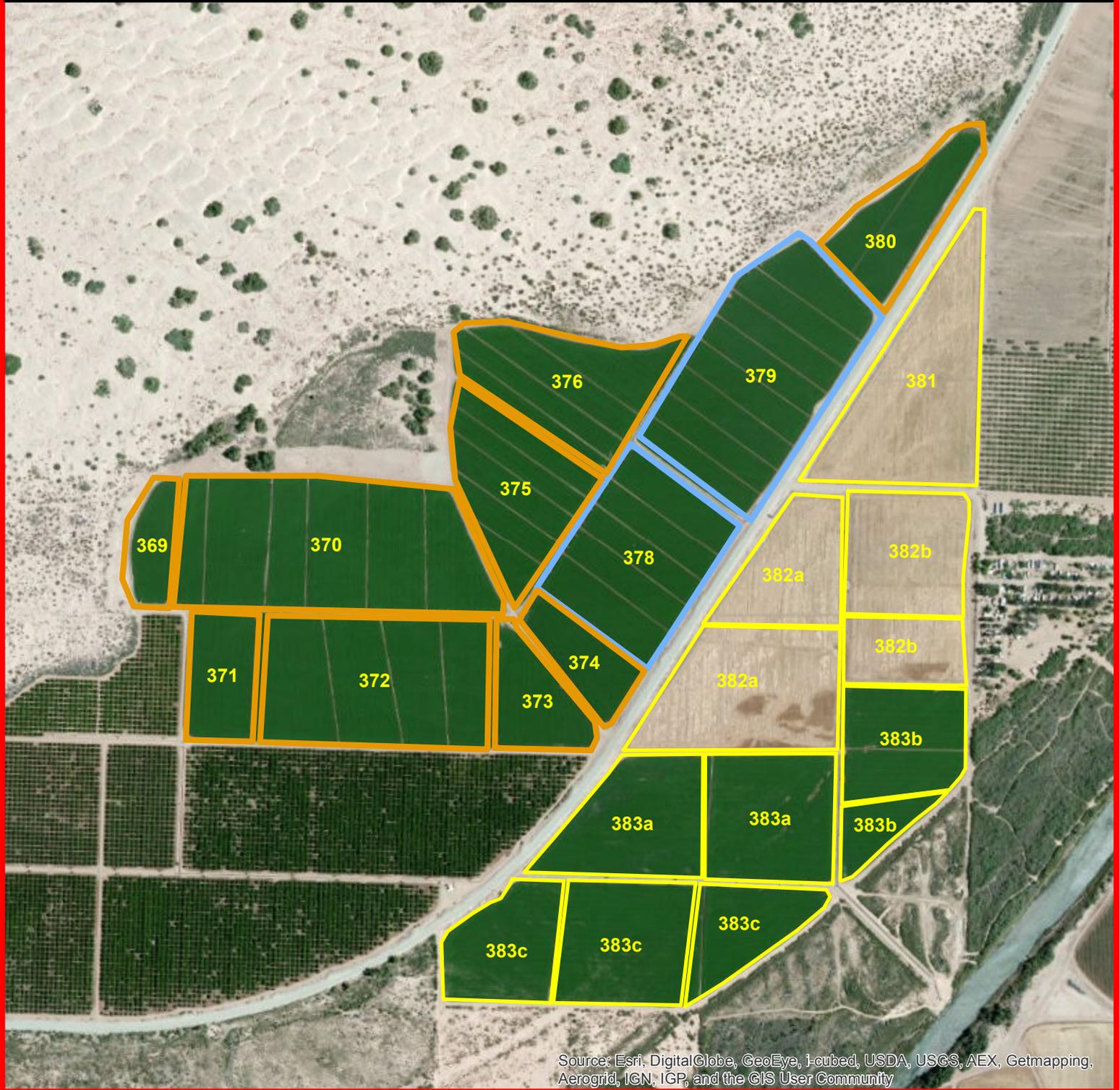


0 0.125 0.25
Mile

Imagery from ESRI, May 29, 2011.

Created by: Jeremy Dodds 3/20/2015
N:\COM420\IOPP\Beattie Farms\Data\BF_2014_fallowing_verification.pdf

RECLAMATION
Managing Water in the West



Source: Esri, DigitalGlobe, GeoEye, i-cubed, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, and the GIS User Community



United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470
MAY 12 2015

IN REPLY REFER TO:

LC-4220
WTR-4.03

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1551 Mammoth Drive
O'Fallon, MO 63366

Subject: Verification of 2014 Inadvertent Overrun Payback by Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In calendar year 2014, the Farm had a payback obligation of 179 acre-feet (AF) for overruns the Farm incurred in 2011 and 2012. In accordance with the IOPP, Griffin Ranches, Inc., on behalf of the Farm, submitted an IOPP Payback Plan for calendar year 2014 (Payback Plan), describing the extraordinary conservation measure (fallowing) the Farm proposed to implement in 2014 to meet its payback obligation. By letter dated September 21, 2013, the Bureau of Reclamation approved the Farm's Payback Plan.

The Farm submitted a report (IOPP certification report) dated March 20, 2015, certifying the extraordinary conservation measure implemented by the Farm in 2014 and the amount of Colorado River water conserved for purposes of meeting the Farm's 2014 payback obligation. As outlined in the Farm's IOPP certification report, the Farm fallowed 81.99 acres from January through December 2014, and an additional 32.47 acres from July through December 2014. The Farm certified that through implementation of this fallowing it conserved 110 AF of Colorado River water in 2014, and requested that this amount be applied towards the Farm's 2014 payback obligation.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation conducted quarterly independent field verification inspections in 2014 and analyzed satellite imagery to verify the fallowing implemented by the Farm. The findings of Reclamation's verification analysis are included in the enclosed report, *Beattie Farms Southwest Inadvertent Overrun and Payback Policy 2014 Verification Report*.

The Inadvertent Overrun and Payback Technical Committee (IOPTC) met on April 16, 2015, to review the Farm's 2014 IOPP certification report and to make a recommendation regarding the adequacy of the report in demonstrating the achieved payback amount. The IOPTC unanimously recommended the Farm be credited with 110 AF of payback for 2014.

Taking into consideration the recommendations provided by the IOPTC members, Reclamation's independent verification, and other information, I verify and make the final determination that the Farm conserved 110 AF of Colorado River water during 2014 as documented in the Farm's 2014 IOPP certification report, and therefore credit the Farm with this amount of payback for 2014. Applying the 110 AF of payback credit reduces the Farm's outstanding overrun balance to 106 AF.

If you have questions, please contact Mr. Paul Matuska, Water Accounting and Verification Group Manager, at 702-293-8164 or pmatuska@usbr.gov.

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

Enclosure

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203

Mr. Thomas Buschatzke
Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012

Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada
555 East Washington Avenue, Suite 3100
Las Vegas, NV 89101

Mr. John Entsminger
General Manager
Southern Nevada Water Authority
1001 South Valley View Boulevard
Las Vegas, NV 89153

Mr. Ray Griffin
P.O. Box 1769
Somerton, AZ 85350-1769
(w/o encl to each)

.BEATTIE FARMS SOUTHWEST (FARM)
INADVERTENT OVERRUN AND PAYBACK POLICY (IOPP)
REVISED PAYBACK PLAN for CALENDAR YEAR 2015

1. Cause of Exceedance of 2014 Adjusted Entitlement

In calendar year 2014, the Farm had an IOPP payback obligation of 179 AF for overruns the Farm incurred in calendar years 2011 and 2012¹. Incorporating this payback obligation, the Farm's adjusted entitlement for 2014 was 931 AF.² In accordance with the IOPP and the Farm's approved Payback Plan for Calendar Year 2014 dated August 15, 2013, the Farm fallowed 55.16 acres in 2014 in order to meet its payback obligation. Based on an application rate of 5 AF/acre, it was anticipated that by fallowing this acreage, the Farm would conserve approximately 276 AF.

To ensure it met its 2014 payback obligation, the Farm made the decision to keep Blocks 374, 375, and 376 (an additional 26.83 acres) out of production for the entire year (i.e. January 1-December 31). Due to unforeseen circumstances, more water was required to bring the Farm's celery crop (which was being produced on lands not subject to the fallowing program) to harvest than was originally estimated. Specifically, this was the first year the Farm produced a vegetable crop on fields that were historically planted in alfalfa, and the light soils required more frequent irrigation than anticipated.

In an effort to keep the Farm's total diversion within the Farm's 2014 adjusted entitlement of 931 AF, the Farm implemented additional measures and did not irrigate Blocks 378 and 379 (32.47 acres) from July 1, 2014 through December 31, 2014 to aid with conservation efforts. Despite these additional efforts, the Farm's total 2014 diversion was 1,000 AF, thereby exceeding its adjusted entitlement by 69 AF. Per the IOPP, the Farm is required to pay back the 69 AF in calendar year 2015. When added to the Farm's existing 2015 payback obligation of 37 AF, the Farm's total payback obligation became 106 AF.

2. IOPP Conservation Measure(s) that will be Implemented to Pay Back the Overrun

In accordance with the Farm's approved IOPP Payback Plan for Calendar Years 2013-2015, the Farm had intended to fallow 6.00 acres in 2015 for purposes of paying back a portion of the Farm's 2011 overrun. To meet the Farm's 2015 revised IOPP payback obligation of 106 AF, the Farm has implemented a fallowing program in which 112.75 acres have been taken out of production. This acreage amount is more than the farm took out of production in 2014 and represents approximately 50% of the Farm's total irrigable acreage. In the absence of this payback obligation the Farm would have irrigated these lands.

3. Location and Schedule of Fallowing with Amount of Water Conserved for 2015

The locations of the fields that will be fallowed are shown on the attached map (Attachment #1). Specifically, to meet the Farm's total 2015 payback obligation of 106 AF, the Farm will fallow blocks 369, 370, 371, 372, 373, 374, 375, 376, 378, 379, and 380 for a total of 114.46 acres. Historically, and in the absence of a payback obligation, these fields have produced an alfalfa crop. Based on an application rate of 2 AF/acre the Farm projects that this fallowing program will conserve a total of 229 AF (Table 1). The Farm believes this estimate is very conservative, but wants to ensure that implementation of this plan

¹See the Bureau of Reclamation's *Colorado River Accounting and Water Use Report Arizona, California, and Nevada* for calendar years 2011 and 2012, available at: <http://www.usbr.gov/lc/region/g4000/wtracct.html>

²Under Contract No. 05-XX-30-W0446 the Farm has an entitlement to 1,110 AF of Arizona Fourth-Priority Colorado River water.

will achieve the Farm's total 2015 payback obligation of 106 acre-feet. The Farm is committed to remaining within its 2015 adjusted entitlement of 1,004 AF.

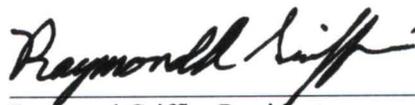
Table 1. Beattie Farms Fallowed Fields and Estimated Conservation, Calendar Year 2015

Year	Field/ Block #	USBR Field #	Acres	Acre-feet/Acre	Acre-feet Conserved
2015	369	8705	2.91	2.00	5.82
	370	8702	21.34	2.00	42.68
	371	9879	4.80	2.00	9.60
	372	8753	16.11	2.00	32.22
	373	8752	4.00	2.00	8.00
	374	8680	4.84	2.00	9.68
	375	8653	9.75	2.00	19.50
	376	8614	12.24	2.00	24.48
	378	17362	13.30	2.00	26.60
	379	8582	19.17	2.00	38.34
	380	8509	6.00	2.00	12.00
Total 2015			114.46		228.92

4. Monitoring and Verifying IOPP Conservation Measure

The Farm will continue to maintain a monthly record of the Farm's Colorado River water diversions and, in 2015, will commit to submitting this report to Reclamation within five business days following the end of the month. Additionally, the Farm will continue to monitor its monthly diversions to ensure it is on target to meet its 2015 payback obligation. If, during the year, the Farm's actual diversions, when combined with its scheduled diversions, are projected to exceed the Farm's 2015 adjusted entitlement, the Farm will consult with Reclamation on a modified schedule and take all necessary actions to limit diversions such that by the end of the year the Farm has successfully met its payback obligation.

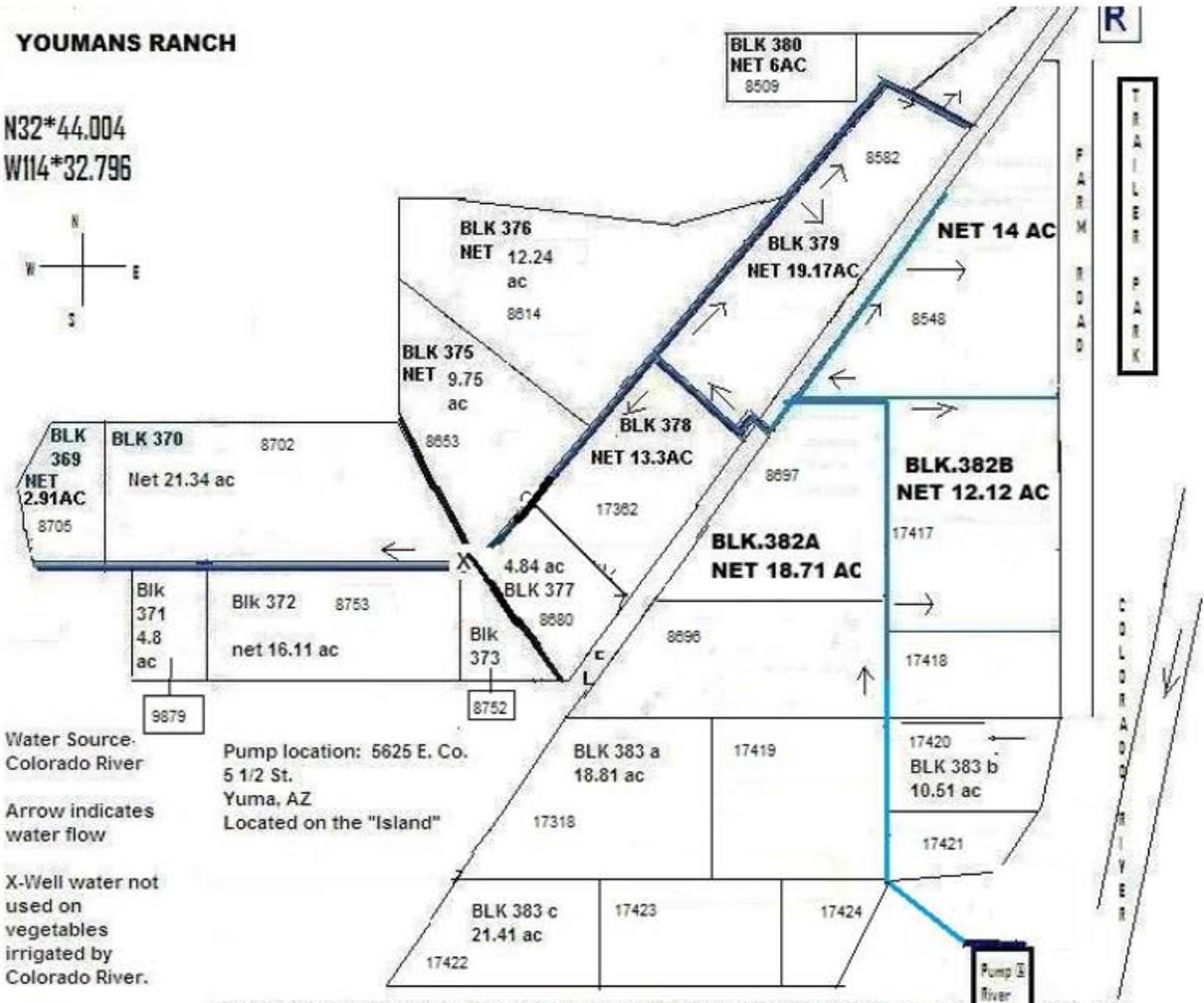
Reclamation will perform quarterly field verification inspections on 100% of the fallowed acreage and will review satellite imagery to ensure that the fields remain fallow during the period outlined in this Plan.



 Raymond Griffin, President
 Griffin Ranches, Inc.

YOUMANS RANCH

N32*44.004
W114*32.796



Water Source:
Colorado River

Arrow indicates
water flow

X-Well water not
used on
vegetables
irrigated by
Colorado River.

R- Restroom

Pump location: 5625 E. Co.
5 1/2 St.
Yuma, AZ
Located on the "Island"

This document contains confidential and proprietary information of Griffin Ranch (GR). It is solely for the benefit of the person or entity to whom it has been delivered by GR, and may not be used nor copies made by any other person or entity without GR's prior written consent.



United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470
MAY 12 2015

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WTR-4.03

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1551 Mammoth Drive
O'Fallon, MO 63366

Subject: Approval of Revised Inadvertent Overrun and Payback Policy (IOPP) Payback Plan for Calendar Year 2015 – Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the IOPP established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. By letter dated February 12, 2015, the Bureau of Reclamation notified the Farm that, based on Reclamation's provisional water accounting records, the Farm exceeded its adjusted Colorado River water entitlement for calendar year 2014 by 69 acre-feet (AF).¹ Pursuant to Section 2.9 of the IOPP, the Farm is required to pay back this exceedance in 2015. When added to the Farm's existing 2015 payback obligation of 37 AF, the Farm's revised 2015 payback obligation is 106 AF.

In response to Reclamation's letter, and in accordance with the IOPP, Griffin Ranches, Inc., on behalf of the Farm, submitted a revised IOPP Payback Plan (Plan) for calendar year 2015 by email dated March 23, 2015. As outlined in the Farm's revised Plan, the Farm will implement a fallowing program in calendar year 2015 in which 114.46 acres will be taken out of agricultural production. Implementation of the fallowing is anticipated to conserve 229 AF, which will meet the Farm's revised 2015 payback obligation of 106 AF.

On April 16, 2015, the Inadvertent Overrun and Payback Technical Committee (IOPTC) reviewed the Plan for technical adequacy and unanimously recommended its approval. Taking into consideration the recommendation of the IOPTC, I make the final determination that the Farm's Plan adequately meets the requirements of the IOPP and approve the Plan for implementation during calendar year 2015.

¹The Farm had a payback obligation in 2014 for overruns the Farm incurred in 2011 and 2012.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation will utilize quarterly field inspections on 100 percent of the fallowed acres and other methods, including analysis of satellite imagery, to verify the Farm has implemented the following program in accordance with its approved Plan.

I remind you that, pursuant to Section 2.9 of the IOPP, should preliminary determinations indicate that sufficient extraordinary conservation or sufficient forbearance of Colorado River water is not projected to occur, Reclamation will notify the Farm of this projection in writing. Reclamation will consult with the Farm on a modified schedule, and will limit releases to the Farm in 2015 such that by the end of the year the Farm has fully met its payback obligation.

Reclamation's administration of the IOPP requires that the Farm submit a report certifying the amount of Colorado River water conserved by implementation of the extraordinary conservation measures in the previous calendar year as defined in Farm's approved Plan. Please submit a report, certifying the amount of conservation achieved in calendar year 2015, to Reclamation no later than February 29, 2016.

Thank you for submitting the Farm's Revised IOPP Payback Plan for Calendar Year 2015. If you have questions, please contact Mr. Paul Matuska, Water Accounting and Verification Group Manager, at 702-293-8164.

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of
California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203

Mr. Thomas Buschatzke
Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012

Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada
555 East Washington Avenue, Suite 3100
Las Vegas, NV 89101

Mr. John Entsminger
General Manager
Southern Nevada Water Authority
1001 South Valley View Boulevard
Las Vegas, NV 89153

Mr. Ray Griffin
P.O. Box 1769
Somerton, AZ 85350

BEATTIE FARMS SOUTHWEST (FARM)
INADVERTENT OVERRUN AND PAYBACK POLICY (IOPP)
Certification Report for CALENDAR YEAR 2015

1. Cause of Inadvertent Overrun

As reported in the Bureau of Reclamation's *Colorado River Accounting and Water Use Report Arizona, California, and Nevada* for calendar years 2011 and 2012, the Farm incurred overruns in the amounts of 453 acre-feet (AF) and 235 AF, respectively. Prior to July 2012, the Farm's diversions were unmetered, and this was the cause of the overruns. In July 2012, the Farm installed a meter and has since been measuring and reporting its diversions on a monthly basis.

2. 2015 IOPP Payback Obligation

At the end of 2012, the Farm's total IOPP overrun balance was 688 AF. In accordance with the IOPP, the Farm was required to pay back 379 AF of this balance in 2013; 272 AF in 2014; and 37 AF in 2015.

In 2013, the Farm successfully conserved 472 AF, or 93 AF more than its required 2013 obligation. The Farm applied the 93 AF towards its 2014 obligation, thereby reducing the Farm's 2014 payback obligation from 272 AF to 179 AF.

In 2014, the Farm exceeded its adjusted Colorado River water entitlement by 69 AF. Pursuant to Section 2.9 of the IOPP, the Farm was required to payback this exceedance in 2015. When added to the Farm's existing payback obligation of 37 AF, the Farm's revised payback obligation for 2015 became 106 AF. Based on the Farm's payback obligation of 106 AF, the Farm's adjusted entitlement for 2015 was 1,004 AF.

3. Conservation Measure(s) implemented in Calendar Year 2015 to Meet the Farm's Required Payback Obligation

As noted above, the Farm was required to pay back 106 AF in calendar year 2015. The Farm's Revised Payback Plan for Calendar Year 2015, approved by Reclamation by letter dated May 12, 2015, outlined a fallowing program in which the Farm would fallow 114.46 acres in 2015 in order to meet the Farm's payback obligation. Based on an application rate of 2 AF per acre, a very conservative estimate, it was anticipated that by fallowing this acreage, the Farm would conserve approximately 229 AF.

4. Location and Schedule of Fallowing with Amount of Water Conserved

The specific fields that were fallowed by the Farm in 2015 in accordance with the Farm's approved payback plan are identified in Table I (see next page), the locations of which may be viewed on the attached map (Attachment #1). Historically, and in the absence of a payback obligation, these fields would be farmed in alfalfa. The estimated conservation yield from fallowing these acres was approximately 229 AF.

Table 1. Beattie Farms Following, Calendar Year 2015.

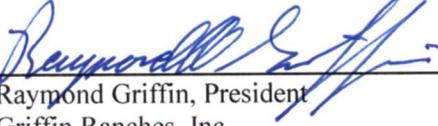
Year	Field/ Block #	USBR Field #	Acres
2015			
Revised Payback Plan	369	8705	2.91
	370	8702	21.34
	371	9879	4.80
	372	8753	16.11
	373	8752	4.00
	374	8680	4.84
	375	8653	9.75
	376	8614	12.24
	378	17362	13.30
	379	8582	19.17
380	8509	6.00	
Total 2015			114.46

5. Monitoring and Verifying IOPP Conservation Measures

The Farm monitored its monthly diversions throughout 2015 to ensure it remained within its adjusted entitlement. The Farm's records of diversions for calendar year 2015, demonstrate that the Farm diverted 758 AF, which is 352 AF below its entitlement of 1,110 AF and 246 AF below its 2015 adjusted entitlement of 1,004 AF.

The Bureau of Reclamation performed quarterly field verification inspections on the fields outlined in the Farm's approved Plan and used satellite imagery to confirm that the fields remained fallow during the entire period.

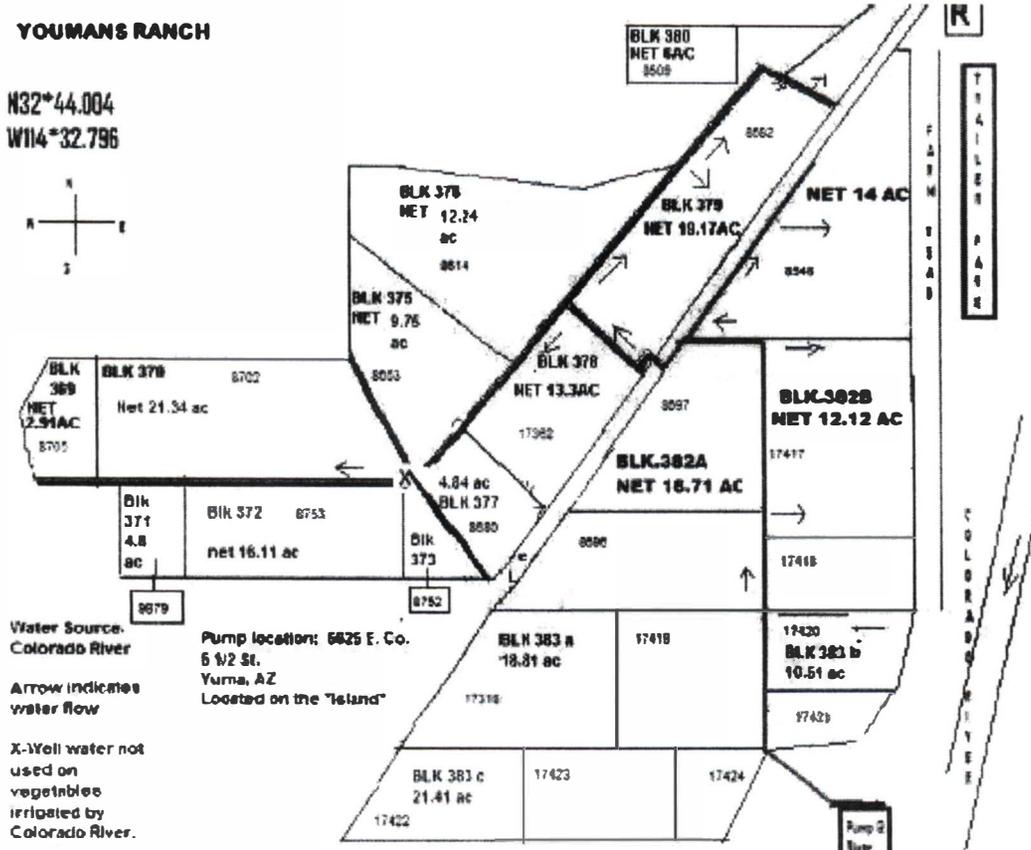
Based on the information provided above and the Farm's 2015 diversion of 758 AF, the Farm certifies that it created adequate conservation in 2015 to meet its 106 AF payback obligation. Applying this conservation to the Farm's overrun balance of 106 AF fully extinguishes the Farm's IOPP payback obligation.


 Raymond Griffin, President
 Griffin Ranches, Inc.

2/26/16
 Date

YOUMANS RANCH

N32°44.004
W114°32.796



Water Source:
Colorado River

Arrow indicates
water flow

X-Well water not
used on
vegetables
irrigated by
Colorado River.

R- Restroom

Pump location: 6625 E. Co.
6 1/2 St.
Yuma, AZ
Located on the "Island"

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United States Department of the Interior

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

IN REPLY REFER TO:

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WTR-4.03

MAY 02 2016

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. and Mrs. Russell Youmans
Beattie Farms Southwest
3025 NW Firwood Place
Corvallis, OR 97330

Mr. Richard Prinster
Beattie Farms Southwest
1551 Mammoth Drive
O'Fallon, MO 63366

Subject: Verification of Calendar Year 2015 Inadvertent Overrun Payback by Beattie Farms Southwest (Farm)

Dear Mr. and Mrs. Youmans and Mr. Prinster:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In accordance with the IOPP, the Farm was required to repay 106 acre-feet (AF) in calendar year 2015 for overruns the Farm incurred in calendar years 2011 and 2012.

In accordance with the Farm's Revised IOPP Payback Plan for Calendar Year 2015 (Plan), approved by the Bureau of Reclamation's letter dated May 12, 2015, the Farm fallowed 114.46 acres during calendar year 2015 to repay 106 AF of the Farm's overrun account balance. On behalf of the Farm, Griffin Ranches, Inc. submitted an IOPP certification report dated February 26, 2016, certifying that the Farm implemented the following program consistent with its approved Plan and conserved adequate conservation in calendar year 2015 to meet the Farm's required payback obligation.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation conducted quarterly independent field verification inspections and analyzed satellite imagery to verify the following implemented by the Farm. The findings of Reclamation's verification analysis are included in the enclosed report, *Beattie Farms Southwest Inadvertent Overrun and Payback Policy Calendar Year 2015 Verification Report*.

The Inadvertent Overrun and Payback Technical Committee (IOPTC) met on April 7, 2016, to review the Farm's IOPP certification report and to make a recommendation regarding the

adequacy of the report in demonstrating the achieved payback amount. The IOPTC unanimously recommended the Farm be credited with 106 AF of payback for calendar year 2015.

Taking into consideration the recommendations provided by the IOPTC members, Reclamation's independent verification, and other information, I make the final determination that the Farm be credited with 106 AF of payback for calendar year 2015. Applying the 106 AF of payback credit fully extinguishes the Farm's IOPP payback obligation.

Thank you for submitting the Farm's IOPP certification report and for the Farm's efforts in completing its IOPP payback obligation. If you have questions, please contact Mr. Paul Matuska, Water Accounting and Verification Group Manager, at 702-293-8164 or pmataska@usbr.gov.

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

Enclosure

cc: Ms. Tanya M. Trujillo
Executive Director
Colorado River Board of California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203

Mr. Thomas Buschatzke
Director
Arizona Department of Water Resources
3550 North Central Avenue
Phoenix, AZ 85012

Jayne Harkins, P.E.
Executive Director
Colorado River Commission of Nevada
555 East Washington Avenue, Suite 3100
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Mr. John Entsminger
General Manager
Southern Nevada Water Authority
1001 South Valley View Boulevard, MS 480
Las Vegas, NV 89153

Mr. Ray Griffin
Griffin Ranches, Inc.
P.O. Box 1769
Somerton, AZ 85350-1769
(w/o encl to each)

Beattie Farms Southwest Inadvertent Overrun and Payback Policy Calendar Year 2015 Verification Report

Beattie Farms Southwest (Farm) overran its Colorado River water entitlement in calendar years 2011 and 2012 by 453 acre-feet (AF) and 235 AF, respectively. In accordance with the Inadvertent Overrun and Payback Policy (IOPP), the Farm was required to pay back the 2011 overrun during calendar years 2013-2015; and the 2012 overrun during calendar year 2014. Having paid back a total of 582 AF in 2013 and 2014, the Farm's payback volume for 2015 was 106 AF.

In accordance with the requirements of the IOPP, the Farm submitted a revised IOPP Payback Plan¹ (Plan) dated March 20, 2015, outlining the extraordinary conservation measures the Farm would implement in 2015 to pay back the required 106 AF. As outlined in the Plan, the Farm intended to fallow 114.46 acres (Farm field nos. 369, 370, 371, 372, 373, 374, 375, 376, 378, 379, and 380; see map in Appendix 1 for field locations) in 2015. But for the payback obligation, the Farm would have irrigated this land for agricultural production. It was anticipated that fallowing this acreage would conserve 229 AF. The Bureau of Reclamation approved the Farm's Plan by letter dated May 12, 2015.

To ensure the Farm was implementing the conservation measures as described in its approved Plan, Reclamation conducted quarterly field verification inspections during 2015 on 100 percent of the acreage identified in the Plan. Additionally, Reclamation performed an analysis on 100 percent of the fields fallowed by the Farm, using multispectral satellite imagery. The images used to perform this analysis may be viewed in Appendix 1. This report presents the data and information collected for verification purposes.

A: Fallowed Field Verification

All of the fields (114.46 acres) identified in the Farm's Plan as fields that would be fallowed in 2015 were visited and checked during each quarterly field verification inspection. These fields include Farm field nos. 369 through 380. As noted above, Reclamation performed an analysis on all of the fields fallowed by the Farm using multispectral satellite imagery.

Observation: All fields were fallowed during each of the quarterly conducted field visits. There was no visible sign that any of the fields had been recently irrigated. Photos from the field visits are included on the following pages.

¹ In 2014, the Farm exceeded its adjusted Colorado River water entitlement by 69 AF. Pursuant to Section 2.9 of the IOPP, the Farm was required to payback this exceedance in 2015. When added to the Farm's existing payback obligation of 37 AF, the Farm's revised payback obligation for 2015 became 106 AF. The Farm was required to modify its payback plan for 2015 to incorporate the increased payback obligation.

1.



Farm Field No. 369.
Reclamation Field No. 8705.
Acres: 2.91

Ground Verification Notes:

February 2 – Fallow. Photo 1.

April 27 – Fallow. Photo 2.

July 6 – Fallow. Photo 3.

November 30 – Fallow. Photo 4.

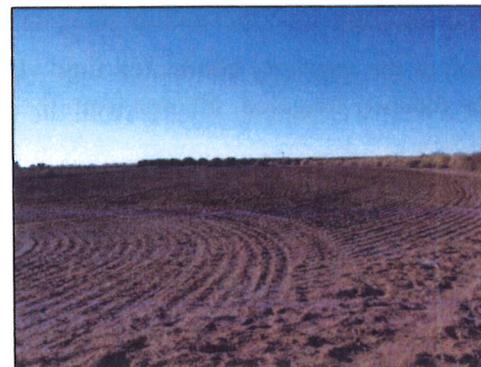
2.



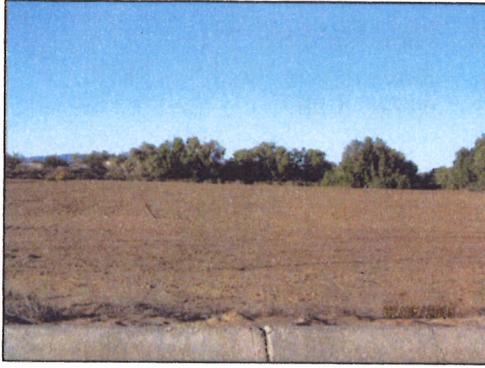
3.



4.



5.



Farm Field No. 370.
Reclamation Field No. 8702.
Acres: 21.34

Ground Verification Notes:

February 2 – Fallow. Photo 5.

April 27 – Fallow. Photo 6.

July 6 – Fallow. Photo 7.

November 30 – Fallow. Photo 8.

6.



7.



8.



9.



Farm Field No. 371.
Reclamation Field No. 9879.
Acres: 4.80

Ground Verification Notes:

February 2 – Fallow. Photo 9.

April 27 – Fallow. Photo 10.

July 6 – Fallow. Photo 11.

November 30 – Fallow. Photo 12.

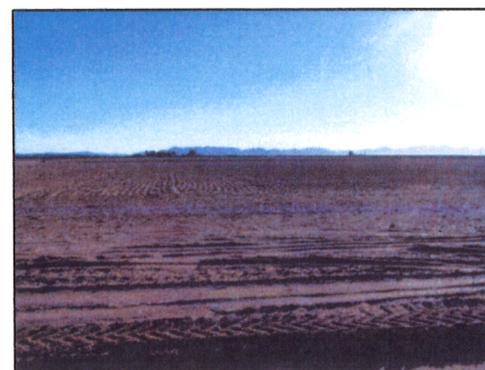
10.



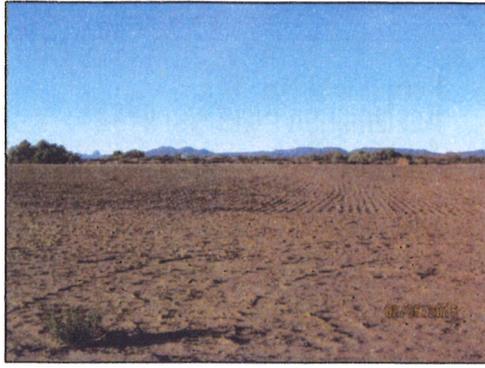
11.



12.



13.

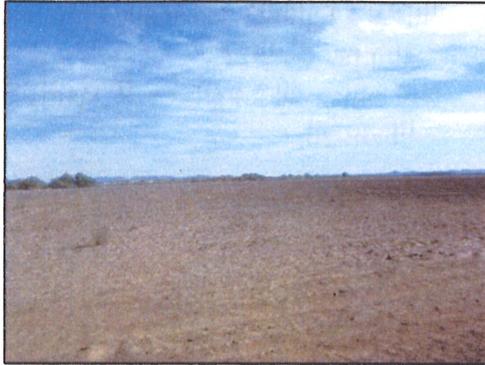


Beattie Field No. 372.
Reclamation Field No. 8753.
Acres: 16.11

Ground Verification Notes:

February 2 – Fallow. Photo 13.
April 27 – Fallow. Photo 14.
July 6 – Fallow. Photo 15.
November 30 – Fallow. Photo 16.

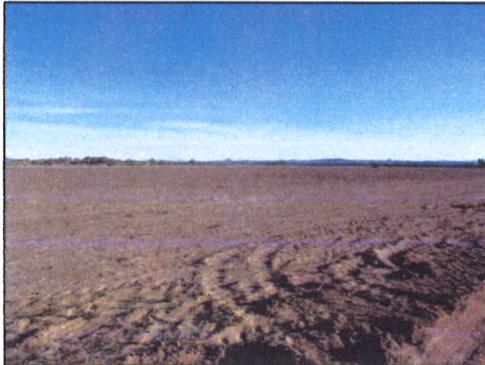
14.



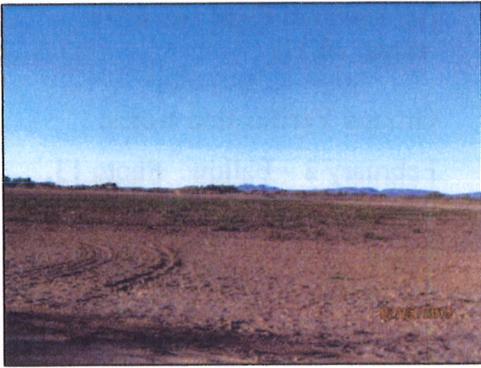
15.



16.



17.



Farm Field No. 373.
Reclamation Field No. 8752.
Acres: 4.00

Ground Verification Notes:

February 2 – Fallow. Thin alfalfa volunteers.
Photo 17.

April 27 – Fallow. Thin alfalfa volunteers.
Photo 18.

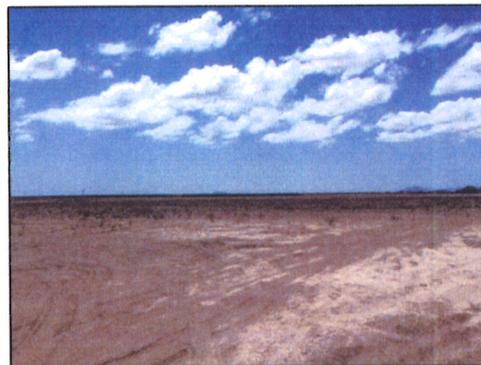
July 6 – Fallow. Dead standing volunteer
alfalfa. Photo 19.

November 30 – Fallow. Recently disked.
Photo 20.

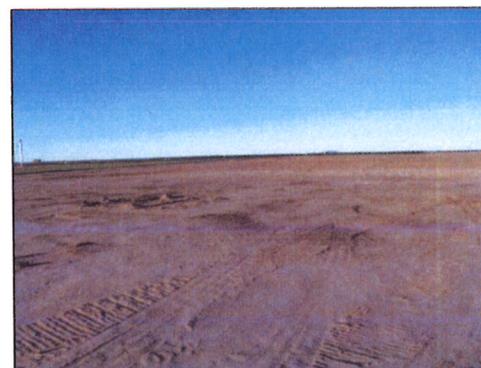
18.



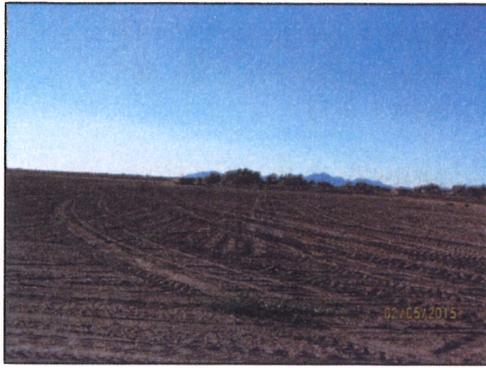
19.



20.



21.



Farm Field No. 374.
Reclamation Field No. 8680.
Acres: 4.84

Ground Verification Notes:

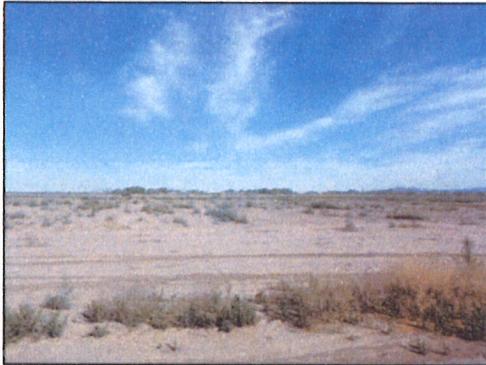
February 2 – Fallow. Photo 21.

April 27 – Fallow. Scattered weeds. Photo 22.

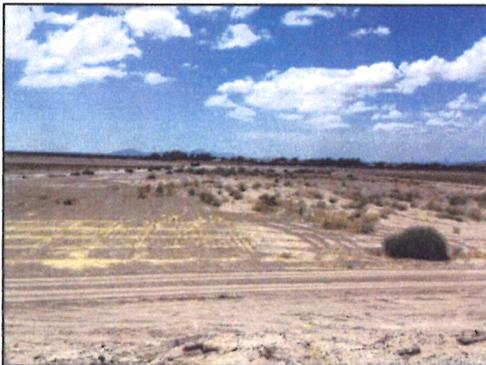
July 6 – Fallow. Scattered weeds. Photo 23.

November 30 – Fallow. Recently disked.
Photo 24.

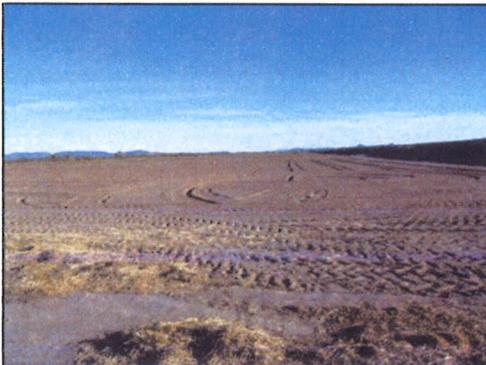
22.



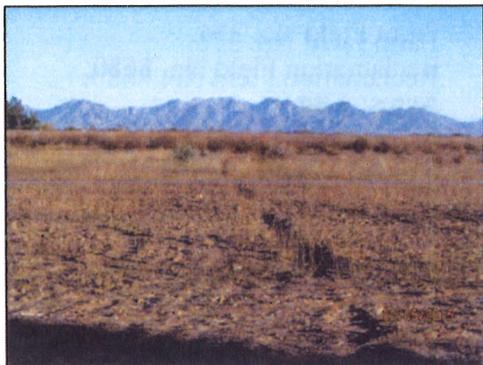
23.



24.



25.



Farm Field No. 375.
Reclamation Field No. 8653.
Acres: 9.75

Ground Verification Notes:

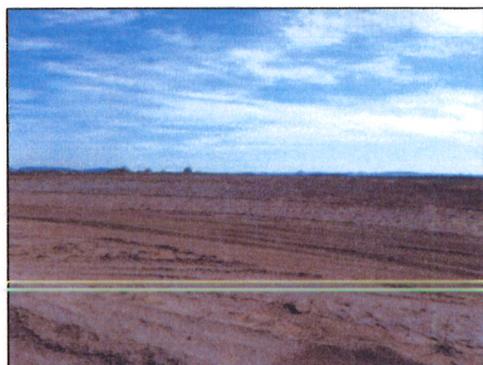
February 2 – Fallow. Senescent weeds. Photo 25.

April 27 – Fallow. Senescent weeds. Photo 26.

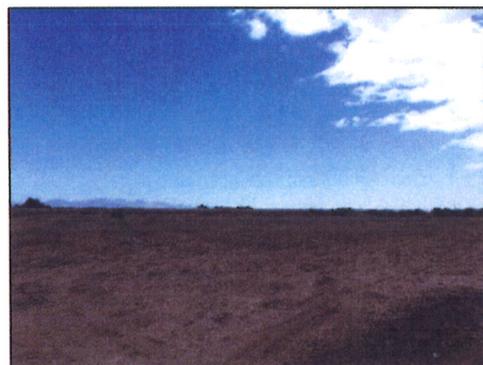
July 6 – Fallow. Senescent weeds. Photo 27.

November 30 – Fallow. Recently disked.
Photo 28.

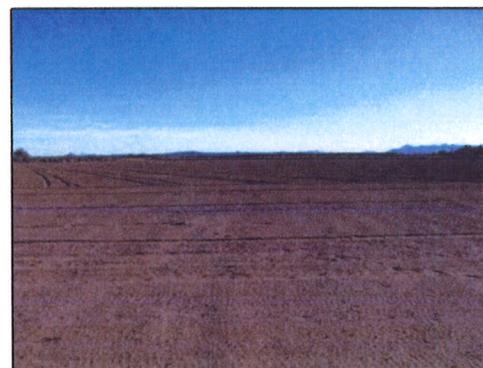
26.



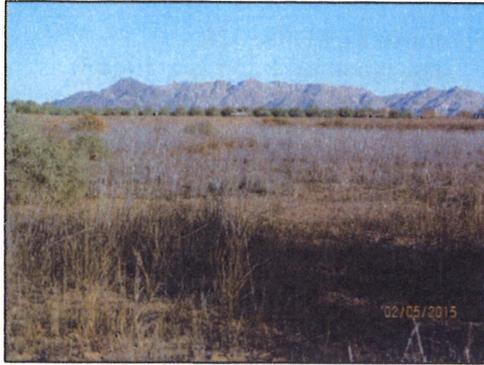
27.



28.



29.



Farm Field No. 376.
Reclamation Field No. 8614.
Acres: 12.24

Ground Verification Notes:

February 2 – Fallow. Senescent weeds. Photo 29.

April 27 – Fallow. Senescent weeds. Photo 30.

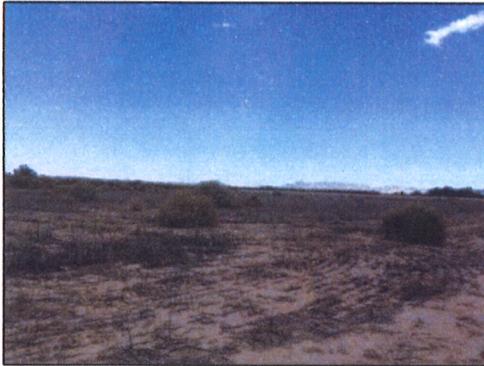
July 6 – Fallow. Senescent weeds. Photo 31.

November 30 – Fallow. Recently disked.
Photo 32.

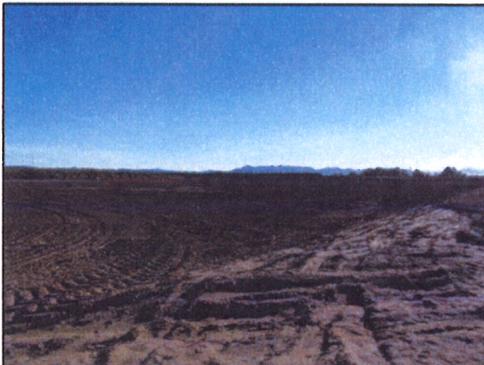
30.



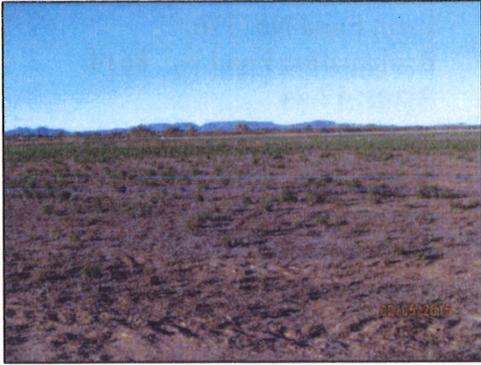
31.



32.



33.



Farm Field No. 378.
Reclamation Field No. 17362.
Acres: 13.30

Ground Verification Notes:

February 2 – Fallow. Seven to twelve inch stressed alfalfa volunteers. Photo 33.

April 27 – Fallow. Seven to twelve inch stressed alfalfa volunteers. Photo 34.

July 6 – Fallow. Seven to twelve inch dead standing volunteer alfalfa. Photo 35.

November 30 – Fallow. Recently disked. Photo 36.

34.



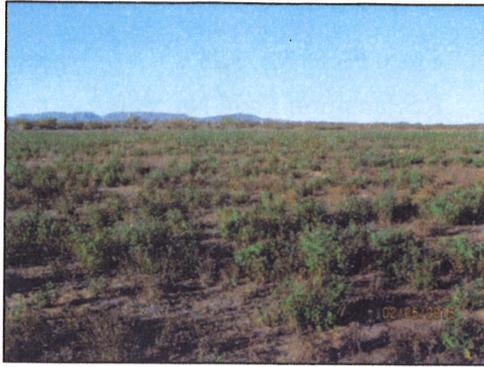
35.



36.



37.



Farm Field No. 379.
 Reclamation Field No. 8582.
 Acres: 19.17

Ground Verification Notes:

February 2 – Fallow. Twelve inch stressed alfalfa volunteers. Photo 37.

April 27 – Fallow. Twelve inch dead standing volunteer alfalfa. Photo 38.

July 6 – Fallow. Twelve inch dead standing volunteer alfalfa. Photo 39.

November 30 – Fallow. Recently disked. Photo 40.

38.



39.



40.



41.



Farm Field No. 380.
Reclamation Field No. 8509.
Acres: 6

Ground Verification Notes:

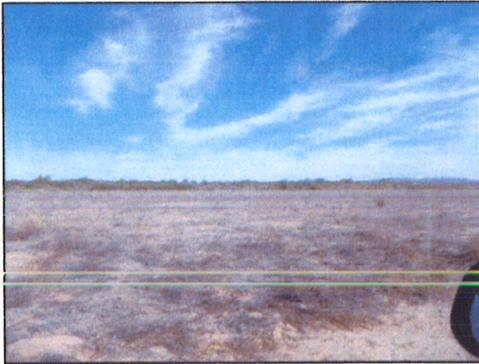
February 2 – Fallow. Old alfalfa stubble.
Photo 41.

April 27 – Fallow. Old alfalfa stubble. Photo
42.

July 6 – Fallow. Old alfalfa stubble. Photo
43.

November 30 – Fallow. Recently disked.
Photo 44.

42.



43.



44.



Based on the observations made and the information collected during the field verification inspection, the implementation of the extraordinary conservation measure(s) in a manner consistent with the Farm's approved payback plan is:

Confirmed Unconfirmed

Jeray Gools
Inspector

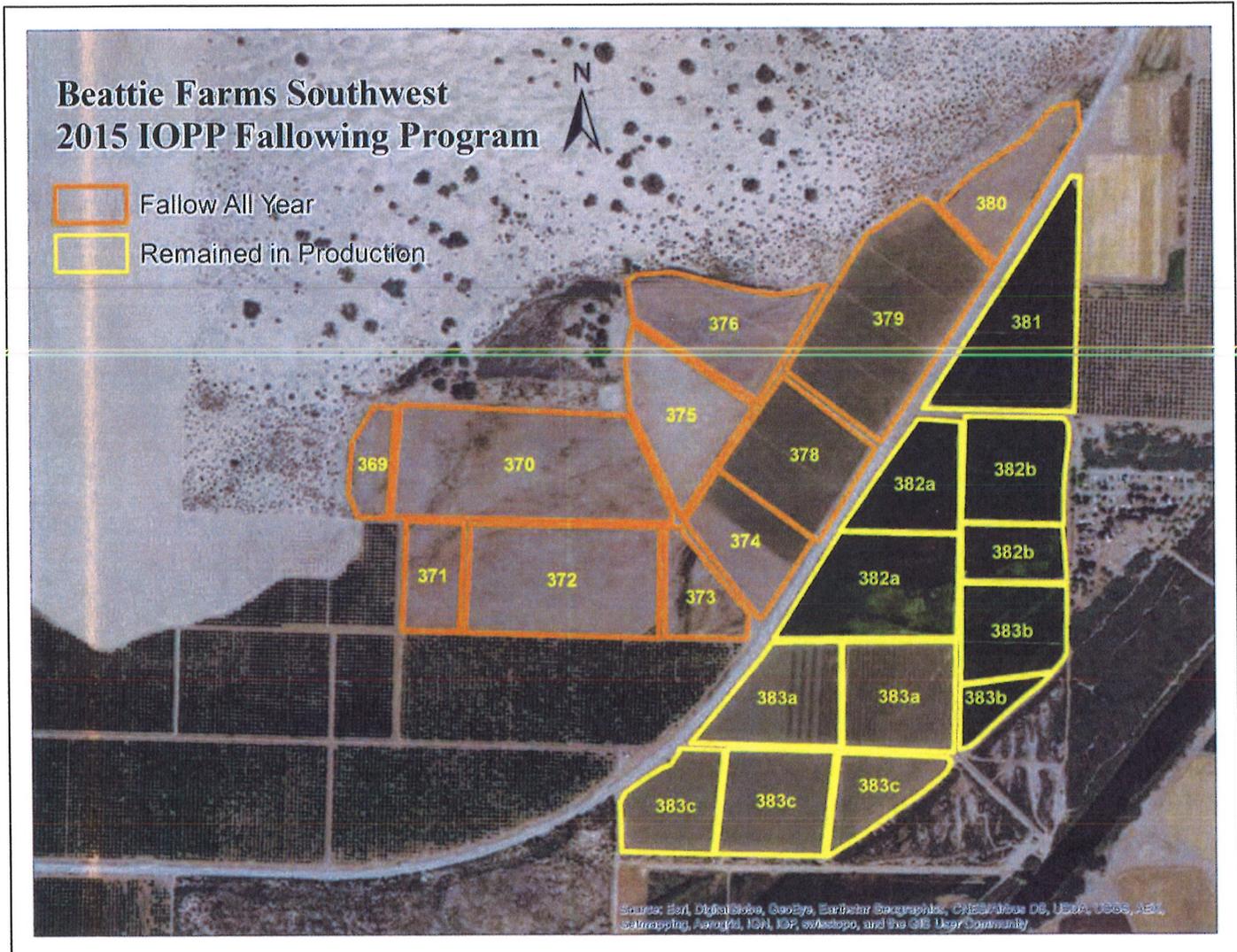
3/30/16
Date

Paul [Signature]
Group Manager

3/30/16
Date

APPENDIX 1

In addition to conducting quarterly field inspections, Reclamation used Landsat 8 satellite imagery and remote sensing analysis to verify the fallowing performed by the Farm during calendar year 2015. A map showing the fields fallowed all year and the images used to perform the remote sensing analysis are below.



NAIP Image date May 30, 2014.

1.

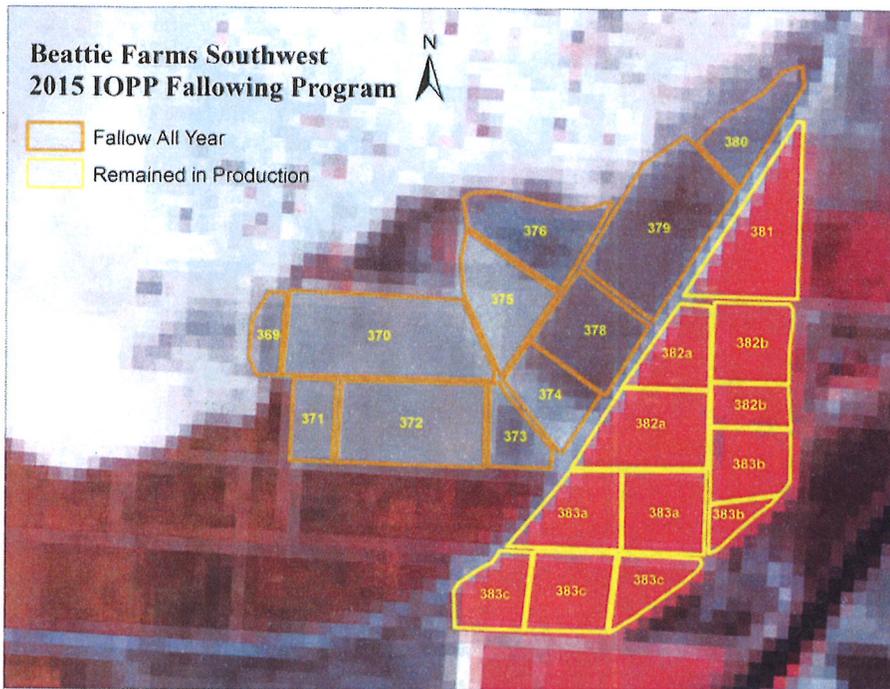


Image date: January 6, 2015. Comments: Fields 373, 376, 378 and 379 have minimal infrared (IR) reflectance resulting from volunteer alfalfa or weeds. All other fields appear to be bare soil.

2.

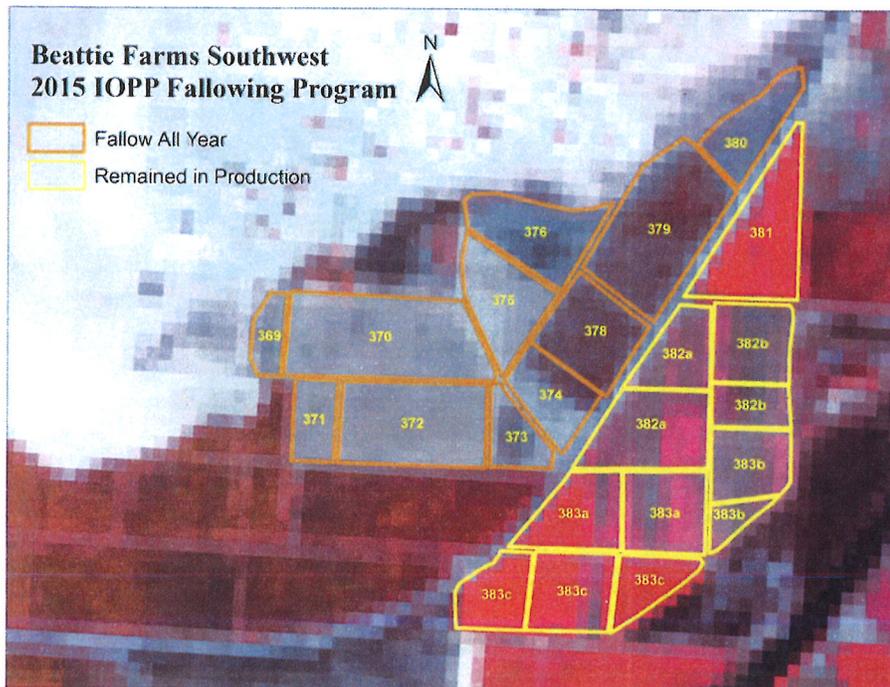


Image date: February 7, 2015. Comments: Fields 373, 376, 378 and 379 have minimal infrared (IR) reflectance resulting from volunteer alfalfa or weeds. All other fields appear to be bare soil.

3.

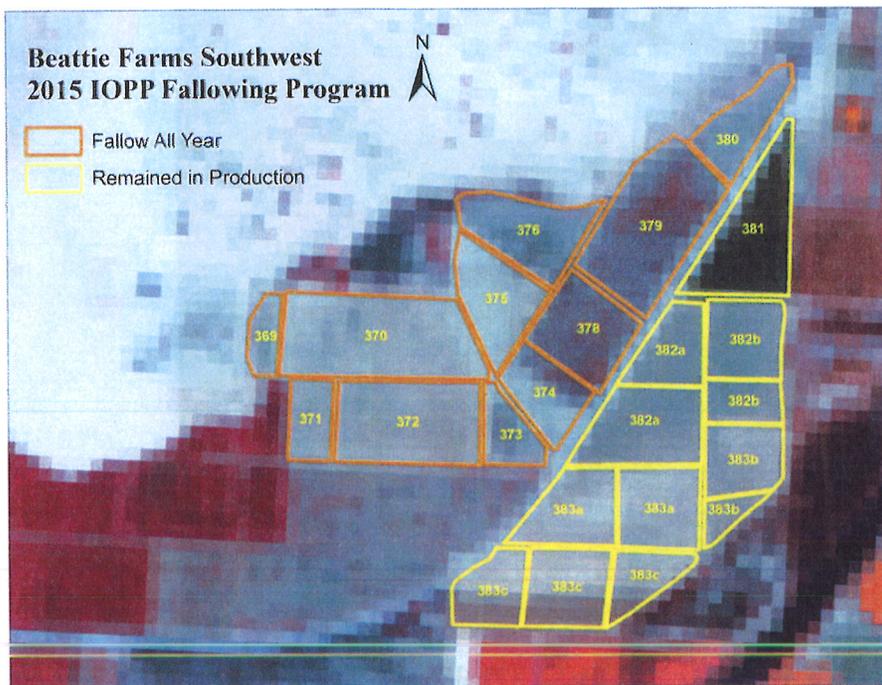


Image date: March 27, 2015. Comments: Fields 373, 376, 378 and 379 have minimal infrared (IR) reflectance resulting from volunteer alfalfa or weeds. All other fields appear to be bare soil.

4.

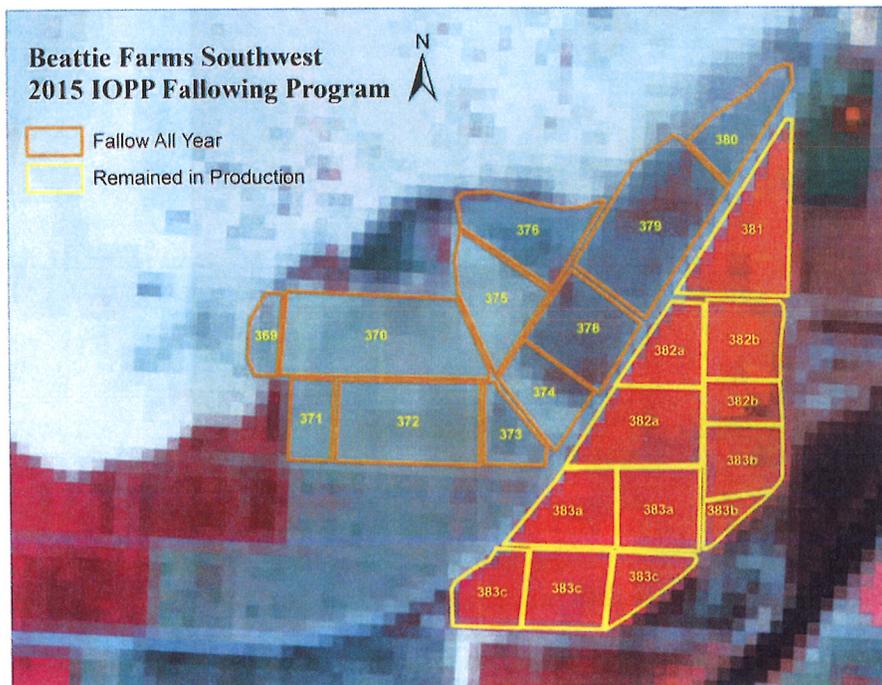


Image date: April 28, 2015. Comments: Fields 373, 376, 378 and 379 have minimal infrared (IR) reflectance resulting from volunteer alfalfa or weeds. All other fields appear to be bare soil.

5.



Image date: May 30, 2015. Comments: Fields 373, 376, 378 and 379 have minimal infrared (IR) reflectance resulting from volunteer alfalfa or weeds. All other fields appear to be bare soil.

6.

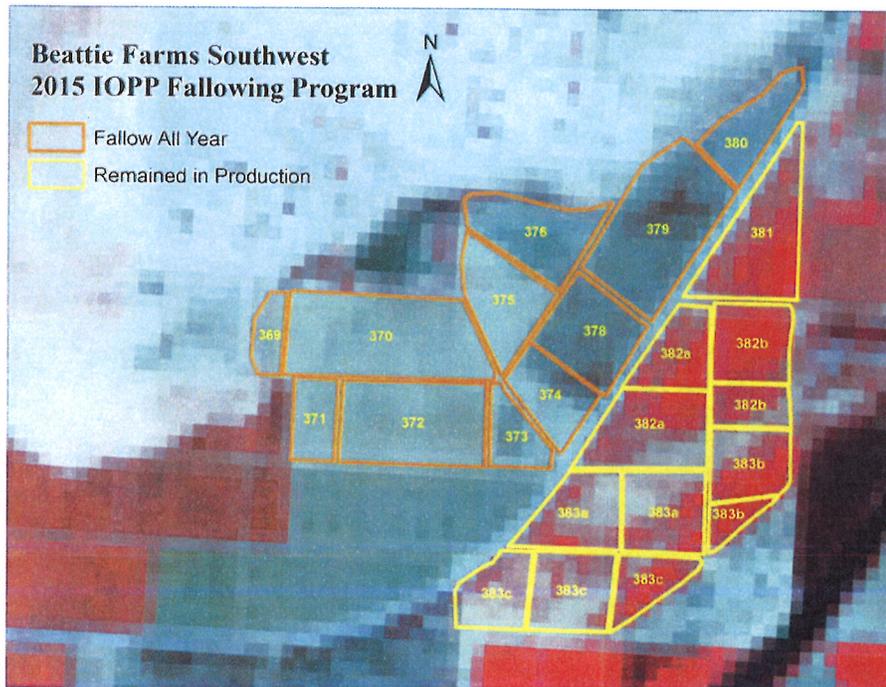


Image date: June 15, 2015. Comments Fields 373, 376, 378 and 379 have minimal infrared (IR) reflectance resulting from volunteer alfalfa or weeds. All other fields appear to be bare soil.