

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**THE VILLAGE OF LOGAN,**

**Plaintiff,**

**v.**

**Case No. 1:12-cv-00401-LAM- LFG**

**UNITED STATES DEPARTMENT OF  
THE INTERIOR; THE HONORABLE  
KENNETH L. SALAZAR, in his capacity as  
SECRETARY, DEPARTMENT OF THE  
INTERIOR, THE BUREAU OF RECLAMATION,  
UNITED STATES DEPARTMENT OF INTERIOR;  
THE HONORABLE MICHAEL L. CONNOR,  
in his capacity as COMMISSIONER,  
THE BUREAU OF RECLAMATION,**

**Defendants.**

**AFFIDAVIT OF KENT SATTERWHITE**

On the date set forth below, **KENT SATTERWHITE** made the following affidavit.

1. My name is Kent Satterwhite. I am the general manager and Secretary-Treasurer of the Canadian River Municipal Water Authority ("CRMWA"). The Texas Legislature created CRMWA in 1953 to provide a source of municipal and industrial water for its member cities in the Texas Panhandle and the Texas South Plains. CRMWA provides water to eleven member cities, including Amarillo and Lubbock, and serves more than a half million people.

2. Lake Meredith is part of the Lake Meredith National Recreation Area located approximately 47 miles northeast of Amarillo, Texas. Lake Meredith is on the Canadian River approximately 90 miles downstream (east) of Ute Lake, New Mexico. From the early 1970's through 2001, Lake Meredith provided a majority of the water CRMWA supplied to its member cities. A true copy of CRMWA's historical water usage and source is attached to this affidavit as Exhibit A.

3. At its peak in 1973, Lake Meredith held 523,867 acre feet of water. In 1999, the volume of water in Lake Meredith had declined to approximately 386,938 acre feet. Over the next ten years, CRMWA withdrew on average approximately 50,000 acre feet of water annually from Lake Meredith, which represented approximately 12.9% of the Lake's volume at the end of 1999. As of August 31, 2012, Lake Meredith holds approximately 22,518 acre feet of water. A true copy of a chart reflecting Lake Meredith's total storage since 1965 is attached hereto as Exhibit B.

4. Over the ten-year period from 1999 to 2009, the inflow of water to Lake Meredith decreased substantially. A true copy of a chart reflecting the historic inflow of water to Lake Meredith is attached hereto as Exhibit C.

5. In the mid-1990's CRMWA began to develop groundwater sources of supply to supplement its surface water supply from Lake Meredith. CRMWA initially acquired 42,594 acres of groundwater rights in Roberts County and installed well fields and transmission facilities to deliver the water into its existing aqueduct system and to its member cities. As Lake Meredith's level continued to decline through the 1990's and 2000's and the water supply available from the lake declined, CRMWA in several increments acquired additional groundwater rights and expanded its groundwater production and delivery system.

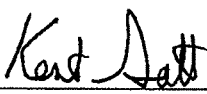
As of September 30, 2009, CRMWA had acquired a total of 260,000 acres of water rights. CRMWA is now one of the largest water rights owners in Texas owning over 442,800 acres of groundwater rights, enough to secure the supply of water to its member cities through the year 2140. CRMWA has spent approximately \$286,730,000 to acquire these groundwater rights and to develop the distribution system to its member cities.

6. The water level in Lake Meredith has declined from approximately 364,420 acre feet at the end of 1999 to approximately 22,518 acre feet today. Attached hereto as Exhibit D are true comparative photographs depicting Lake Meredith's water levels in 1998, 2008, and 2011.

7. As of August 31, 2012, Lake Meredith holds only 22,518 acre feet of water, less than 4.3% of the amount it held at its peak in 1973. The year 2012 will be the first year that water was not delivered from Lake Meredith to supplement city water supplies.

8. I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: 9-5-12, 2012.

  
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Kent Satterwhite

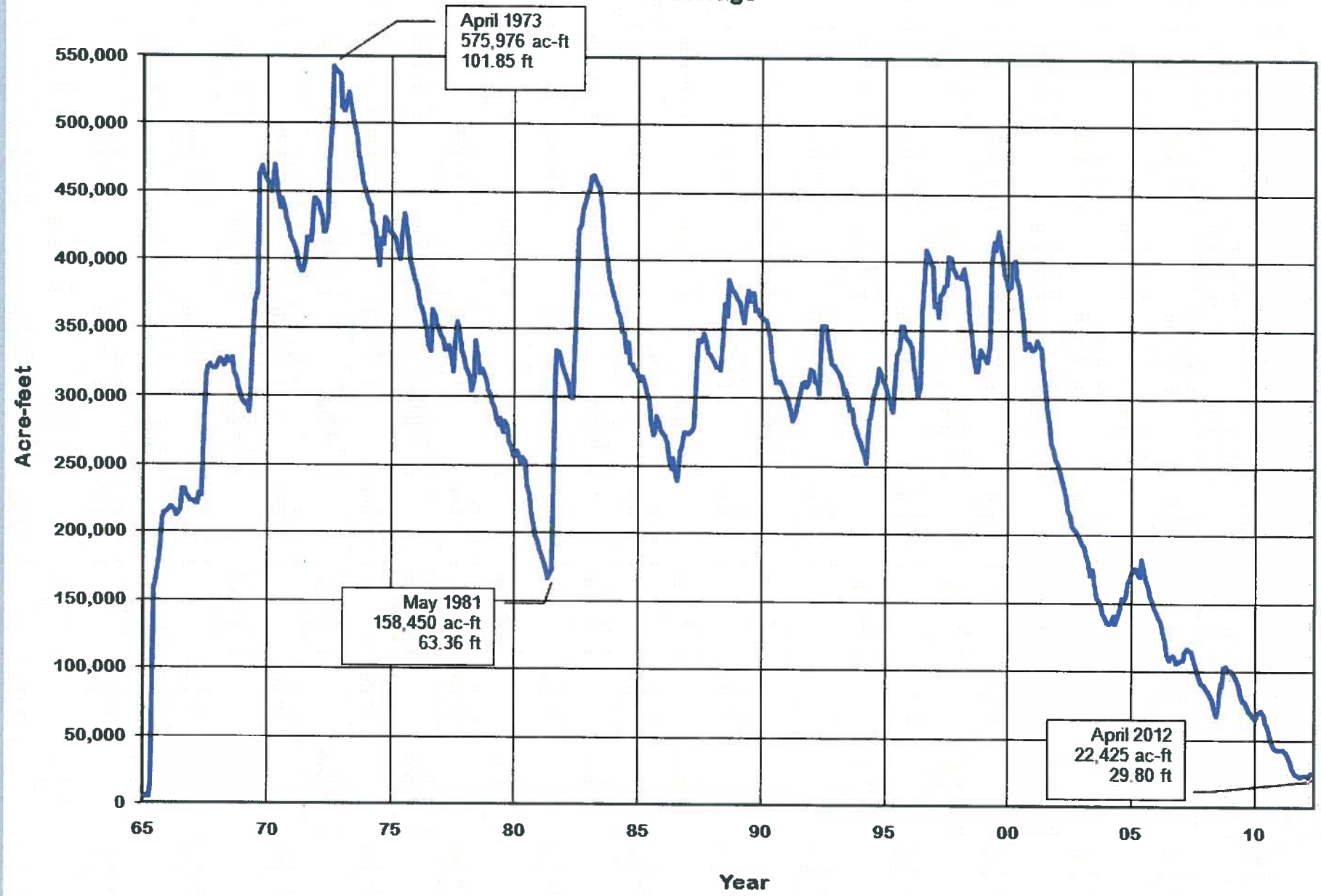
# **EXHIBIT A**

TOTAL Usage (Acre-feet)					
Year	CRMWA Lake	CRMWA JCW	CRMWA Supply	CITY Supply	TOTAL
65				76,193	76,193
66	89		89	74,471	74,560
67	411		411	70,031	70,442
68	29,292		29,292	39,237	68,529
69	56,229		56,229	16,327	72,556
70	58,922		58,922	22,167	81,089
71	60,325		60,325	21,095	81,420
72	60,954		60,954	18,642	79,596
73	59,269		59,269	21,939	81,208
74	66,959		66,959	21,656	88,615
75	65,702		65,702	18,978	84,680
76	63,820		63,820	28,008	91,828
77	62,344		62,344	32,779	95,123
78	69,053		69,053	36,321	105,374
79	72,745		72,745	28,273	101,018
80	77,241		77,241	34,223	111,464
81	69,143		69,143	30,681	99,824
82	66,128		66,128	31,022	97,150
83	69,345		69,345	42,412	111,757
84	73,223		73,223	32,236	105,460
85	72,810		72,810	32,164	104,974
86	65,679		65,679	33,645	99,323
87	62,516		62,516	35,810	98,326
88	64,332		64,332	34,582	98,914
89	67,841		67,841	36,310	104,151
90	71,259		71,259	40,419	111,678
91	70,028		70,028	37,066	107,094
92	70,365		70,365	28,588	98,954
93	70,982		70,982	36,845	107,827
94	69,426		69,426	44,590	114,016
95	70,686		70,686	47,201	117,888
96	74,480		74,480	45,722	120,202
97	73,058		73,058	35,881	108,939
98	81,000		81,000	48,388	129,388
99	80,474		80,474	32,903	113,377
00	86,434		86,434	42,445	128,878
01	78,787		78,787	41,004	119,790
02	54,654	30,540	85,194	32,450	117,644
03	57,864	33,708	91,572	34,934	126,506
04	36,518	36,611	73,129	30,263	103,392
05	47,215	35,501	82,715	32,660	115,376
06	41,837	40,125	81,962	40,264	122,226
07	33,430	37,676	71,106	31,874	102,980
08	28,050	40,442	68,492	41,717	110,209
09	35,720	37,168	72,888	35,247	108,136

# **EXHIBIT B**

# LAKE MEREDITH

## Total Storage

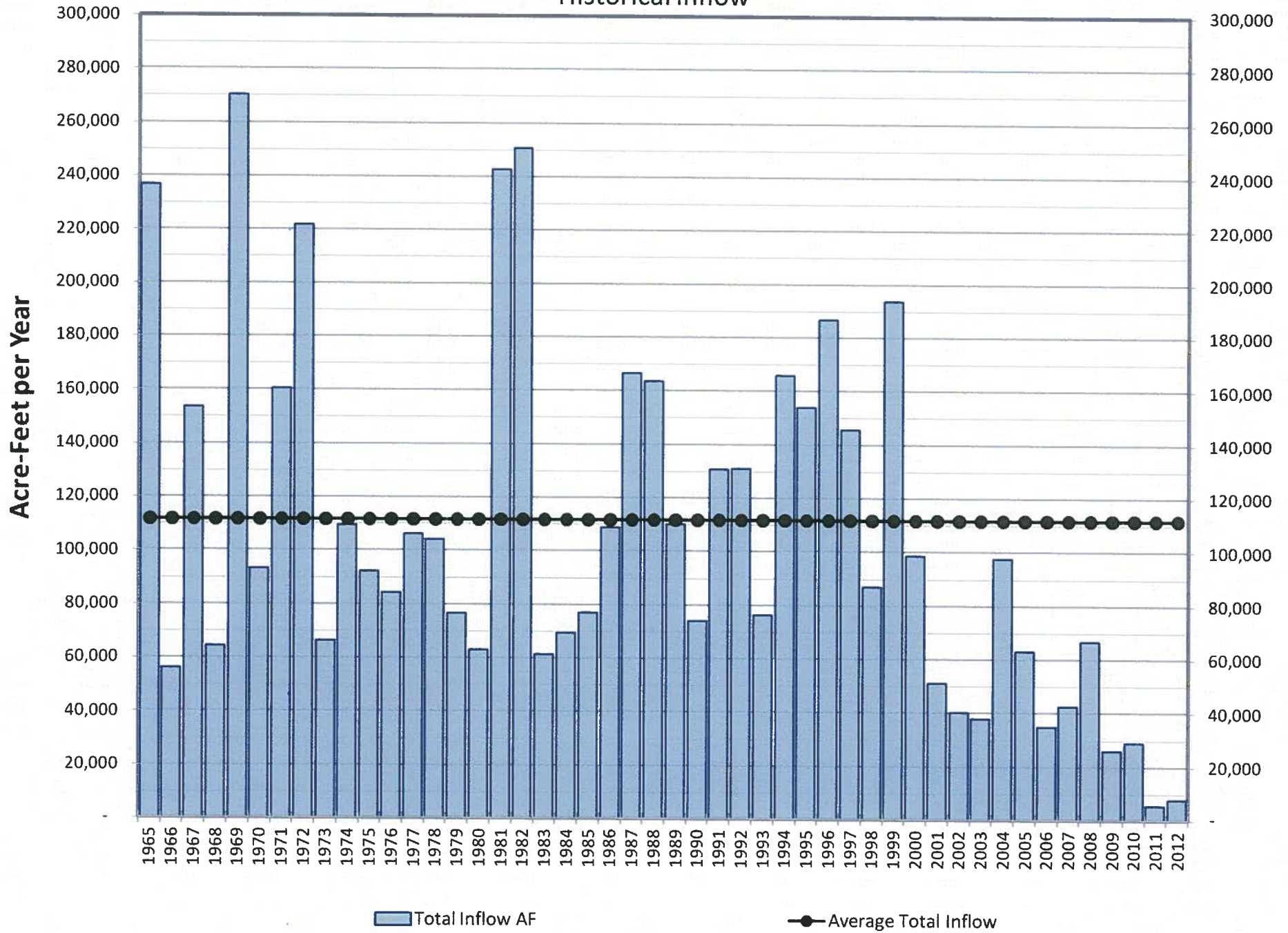


# **EXHIBIT C**



# Lake Meredith

## Historical Inflow



# **EXHIBIT D**



Late 1998



2008





2011