

## **EXHIBIT 1**

### **FUNDING OPPORTUNITY FOR VOLUNTARY PARTICIPATION IN THE LOWER COLORADO CONSERVATION AND EFFICIENCY PROGRAM**



# United States Department of the Interior

BUREAU OF RECLAMATION  
P.O. Box 61470  
Boulder City, NV 89006-1470



IN REPLY REFER TO:  
LCB-4000  
2.2.4.23

VIA ELECTRONIC & OVERNIGHT MAIL

## Interested Parties

Subject: Funding Opportunity for Voluntary Participation in the Lower Colorado Conservation and Efficiency Program

## Greetings:

The purpose of this letter is to follow-up on the Department of the Interior's September 22, 2022, announcement of additional steps to address drought in the Colorado River Basin (<https://www.usbr.gov/newsroom/news-release/4338>). The Department of the Interior (Department) through the Bureau of Reclamation (Reclamation) is creating this new Lower Colorado Conservation and Efficiency Program (LC Conservation Program) to increase system conservation and efficiency opportunities to address the unprecedented drought in the Lower Colorado River Basin. Similar conservation programs in the Upper Colorado River Basin and other basins experiencing comparable levels of long-term drought are also being developed. The new LC Conservation Program is a part of the commitment made by the Department on August 16, 2022, to address the drought crisis with prompt and responsive actions and investments to ensure the entire Colorado River Basin (Basin) can function and support all who rely on it.

Prolonged drought and low runoff conditions accelerated by climate change have led to historically low water levels in Lakes Powell and Mead. Over the last two decades, Department leaders have engaged with Basin partners on various drought response operations. However, given that water levels are projected to continue to decline, additional action is needed to protect the Colorado River System and prevent the reservoirs from falling to critically low elevations threatening water deliveries and power production. Reclamation is using the best available science and actively collaborating with water users across the Basin to determine the best ways to meet this increased conservation need. The historic funding committed by the Biden-Harris Administration in the Bipartisan Infrastructure Law and the recently passed Inflation Reduction Act provide resources for water management and conservation efforts in the Basin and other basins experiencing comparable levels of long-term drought. The Department will continue to deploy these resources in the Lower Colorado River Basin with this LC Conservation Program.

The LC Conservation Program is intended to provide new opportunities to fund system conservation and efficiencies in the Lower Colorado River Basin that lead to additional conservation and bridge the immediate need while moving toward improved system efficiency and more durable long-term solutions for the Colorado River system.

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INTERIOR REGION 8 • LOWER COLORADO BASIN

ARIZONA, CALIFORNIA\*, NEVADA\*

\* PARTIAL

The LC Conservation Program has three components:

- 1.a.) Beginning immediately, Reclamation is accepting proposals for system conservation resulting in additional volumes of water remaining in Lake Mead at a set price of:

- One-year agreement: \$330 per acre-foot
- Two-year agreement: \$365 per acre-foot
- Three-year agreement: \$400 per acre-foot

This program will require a system conservation agreement with Reclamation and is similar to previous system conservation efforts in Lower Colorado River Basin under the Pilot System Conservation Program and system conservation under the Lower Basin Drought Contingency Plan. Lower Colorado River water delivery contract or entitlement holders and Central Arizona Project water delivery contract or entitlement holders are eligible to participate in the LC Conservation Program. We request this first round of 1.a. proposals be submitted no later than November 21.

- 1.b.) Additionally, beginning immediately, Reclamation will accept the first round of proposals describing Lower Colorado River Basin water conservation plans that can be implemented resulting in reductions in consumptive use of lower Colorado River water having a recent history of use. The proposals will include a price per acre-foot; economic justification for the price; plan description; proposed conservation amount; verification methodologies; approximate time frame for startup and the plan duration. The proposal must meet the requirements enclosed with this letter (Enclosure). Plan proposals that reduce Colorado River consumptive use based on new or innovative concepts and collaboration among partners is encouraged. Colorado River water delivery contract or entitlement holders and Central Arizona Project water delivery contract or entitlement holders are eligible to apply. We request this first round of 1.b. proposals be submitted no later than November 21.

- 2) In early 2023, Reclamation will announce an opportunity for entities to submit proposals for long-term system efficiency improvements that will result in additional system conservation. The proposal review and evaluation process will be competitive and ranking factors will include: the amount and timing of water conserved in Lake Mead; the duration of the conservation; and previous participation in existing conservation programs and/or the LC Conservation Program described in 1.a. and 1.b. above with emphasis placed on participation in 1.a. conservation.

The Department encourages participation under this voluntary LC Conservation Program to minimize any reductions in the future. If you are interested in participating in the 1.a. or 1.b. component of the LC Conservation Program, submit your proposal electronically by November 21, 2022, to:

Daniel A. Bunk  
Chief, Boulder Canyon Operations Office  
Email: [dbunk@usbr.gov](mailto:dbunk@usbr.gov).

To the extent permissible by applicable law, proposals will remain confidential until plan agreements are executed to preserve the competitive nature of the selection process.

Should you have questions regarding the LC Conservation Program, or wish to discuss plan concepts, please contact Daniel Bunk at 702-293-8013 or [dbunk@usbr.gov](mailto:dbunk@usbr.gov). Individuals in the United States, who are deaf, deafblind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or Tele Braille) to access telecommunication relay services. Individuals outside the United States should use the relay services offered within their country to make international calls to the point-of-contact in the United States.

Sincerely,

JACKLYNN  
GOULD

Digitally signed by  
JACKLYNN GOULD  
Date: 2022.10.12 11:29:07  
-07'00'

Jacklynn L. Gould, P.E.  
Regional Director  
Interior Region 8: Lower Colorado Basin  
Bureau of Reclamation

## **ENCLOSURE 1**

### **Requirements for Lower Basin System Conservation and Efficiency Project Proposals**

**Purpose:** The Lower Colorado River Basin System Conservation and Efficiency Program (LC Conservation Program) is intended to provide new opportunities for system conservation in the Lower Colorado River Basin that also lead to additional conservation and bridge the immediate need while moving toward improved system efficiency and more durable long-term solutions for the System. The Bureau of Reclamation is requesting proposals describing Lower Colorado River Basin water conservation projects that can be implemented resulting in reductions in consumptive use of Colorado River water having a recent history of use. Colorado River water delivery contract or entitlement holders and Central Arizona Project (CAP) water delivery contract or entitlement holders are eligible to apply. The conserved Colorado River System water will not accrue to the benefit or use of any individual Colorado River water user.

#### **Proposal and Selection Requirements:**

##### **Proposal Requirements**

##### **System Conservation Program Under a Set Fixed Price (Program 1.a. in Letter)**

The LC Conservation Program fixed-priced 1.a. proposals must include the following information:

- Plan description.
- The amount of Colorado River System water to be conserved per year and over the life of the proposed plan.
  - System water conserved shall be based on a history of use (not entitlement); this criterion will be reviewed on a case-by-case basis.
- Methodology for estimated consumptive use reduction and supporting information that documents the estimate.
- Description of how the proponent will verify and document the consumptive use reduction on an annual or more frequent basis, as appropriate.

We request this first round of 1.a. proposals be submitted no later than November 21, 2022.

##### **Proposals for System Conservation (Program 1.b. in Letter)**

The LC Conservation Program fixed-priced 1.b. proposals must include the following information:

- Plan description.
- The amount of Colorado River System water to be conserved per year and over the life of the proposed plan.
  - System water conserved shall be based on a history of use (not entitlement); this criterion will be reviewed on a case-by-case basis.
- Methodology for estimated consumptive use reduction and supporting information that documents the estimate.
- Description of how the proponent will verify and document the consumptive use reduction

on an annual or more frequent basis, as appropriate.

- Amount of time required to implement the conservation plan and the plan duration.
- Estimated cost per acre-foot of conserved water (on either an annual basis or other proposed period of plan operation) and economic explanation of the proposed cost.
- Description of how the proposed plan will ensure that the amount of conserved water to remain in Lake Mead will not be ordered by other entitlement holder(s), for example, through third party consents or forbearance agreements.
- Any additional information deemed helpful to explain and aid understanding of the proposal.

We request this first round of 1.b. proposals be submitted no later than November 21, 2022.

### **Selection Criteria**

#### **System Conservation Program Under a Set Fixed Price (Program 1.a. in Letter)**

Reclamation will select proposals on the basis of how well they meet the following requirements. In developing your proposal, please keep in mind:

- Only Colorado River water delivery contract or entitlement holders and CAP water delivery contract or entitlement holders are eligible to participate in the LC Conservation Program.
- Entities and/or individuals will need to collaborate with Reclamation and other water entitlement holders in your state to ensure that the conserved water is not ordered for delivery and that it remains in Lake Mead.
- In early 2023, the Department will announce an opportunity for entities to submit proposals for long-term system efficiency improvements that will result in additional system conservation. The proposal review and evaluation process will be competitive, and ranking will occur on factors including: the amount and timing of water conserved in Lake Mead; the duration of the conservation; and previous participation in existing conservation programs and/or this LC Conservation Program.

#### **System Conservation (Program 1.b. in Letter)**

Reclamation will select proposals on the basis of how well they meet the following requirements. In developing your proposal, please keep in mind:

- Only Colorado River water delivery contract or entitlement holders and CAP water delivery contract or entitlement holders are eligible to participate in the LC Conservation Program.
- The proposal review and evaluation process is competitive; ranking will occur on the amount and timing of water conserved in Lake Mead, the cost per acre-foot, feasibility in verifying and accounting for water conserved in Lake Mead and evaluating the uniqueness of testing new approaches for creating conservation.
- Entities and/or individuals may have already committed financial and other resources to water use plans for calendar years 2022 and 2023. In such cases, we are flexible regarding plan initiation.
- Entities and/or individuals will need to collaborate with Reclamation and other water entitlement holders in your state to ensure that the conserved water is not ordered for delivery and that it remains as system conservation in Lake Mead.
- In early 2023, the Department will announce an opportunity for entities to submit proposals for long-term system efficiency improvements that will result in additional system conservation. The proposal review and evaluation process will be competitive, and ranking will occur on factors including: the amount and timing of water conserved in Lake Mead; the duration of the system conservation; and previous participation in existing

system conservation programs and/or this LC Conservation Program.

**Other Information:** Participants will be required to execute a System Conservation Implementation Agreement (SCIA) with Reclamation containing terms and conditions for the design, implementation, monitoring, evaluation of the LC Conservation Program plan, and compensation to the entitlement holder proposing the plan, and setting forth the obligations of the parties. By entering into a SCIA, the participant grants access to Reclamation to perform periodic on-site inspections of system conservation plan. Participants must be in compliance with applicable Federal, State, and local environmental, cultural, and paleontological resource protection laws and regulations throughout the term of the SCIA. Reclamation's annual Colorado River Accounting and Water Use Report: Arizona, California, and Nevada will serve as the basis for documenting the amount of system conservation achieved under the LC Conservation Program.

## **EXHIBIT 2**

### **PROPOSAL FOR A COLORADO RIVER WATER CONSERVATION PROGRAM**

#### **PLAN DESCRIPTION**

##### **Purpose**

To assist in a coordinated effort to protect critical reservoir water levels in the Colorado River Basin during the current drought, Coachella Valley Water District (CVWD) is proposing to establish a Colorado River Water Conservation Program (CRW Conservation Program) to reduce the consumptive use of Colorado River water for a three-year term for calendar years (CYs) 2023 through 2025. The CRW Conservation Program is based on voluntary, temporary, and compensated conservation of Colorado River water historically used for the irrigation of lands within CVWD's service area. The conserved water shall not be consumptively used by CVWD or other Colorado River contractors and shall instead be made available by forbearance to assist in the management of reservoir levels in the Colorado River in the Lower Basin during the current drought conditions.

##### **CVWD Responsibilities**

If the proposal is accepted, CVWD, upon authorization by the Board and compliance with the California Environmental Quality Act (CEQA), will execute a system conservation agreement with the U.S Bureau of Reclamation (Reclamation) and agree not to divert the conserved water. The CVWD's Board will also amend its current program regulations to implement the CRW Conservation Program and to conform to the requirements of the agreement.

CVWD shall (1) administer the CRW Conservation Program, (2) review applications from growers willing to participate in the CRW Conservation Program (3) determine from CVWD records the baseline historical use against which conserved water volumes will be measured, (4) select the eligible applicants in accordance with program regulations to enter into contracts with CVWD, (5) verify the volume of conserved water and (6) pay participants in the CRW Conservation Program for each volume (measured in acre-foot (af) of verified conserved water).

##### **Reclamation Responsibilities**

Reclamation shall reimburse CVWD for the volume of actual verified conserved water at the fixed price. Reclamation may also provide technical assistance in the review of applications and verification of the volume of water conserved.

##### **Other Parties' Responsibilities**

The Metropolitan Water District of Southern California and Imperial Irrigation District will need to agree to forbear diverting and using the water conserved under the CRW Conservation Program.

##### **Applications for Participation in the CRW Conservation Program**

CVWD customers desiring to participate in the CRW Conservation Program shall submit a completed application to CVWD in accordance with the program regulations.

##### **Evaluation of Applications and Selection of Applicants for Agreements with CVWD**

CVWD, in its sole discretion, may decline to proceed with an application if the records and data or the varied history of irrigation of the lands set forth in the application and/or other land owned or farmed by a customer within CVWD's service area are insufficient in CVWD's sole judgment, to determine a historical baseline of water use that shall provide an accurate determination of the volume of water saved by conservation and/or provide an accurate determination of compliance with the obligation of a customer.



CVWD shall select and prepare a schedule of qualified applications ranked in accordance with the program regulations and accordingly determine which applications may be offered an agreement.

#### **Agreements between CVWD and Customers for Participation in the CRW Conservation Program**

Successful applicants shall sign Grower agreements in the form prescribed the program regulations and return to CVWD for execution by the General Manager. No agreement shall be effective until executed by CVWD's General Manager.

#### **Suspension or Termination of Participation in the CRW Conservation Program**

CVWD may elect to terminate or suspend a Grower's participation in the CRW Conservation Program as it shall be provided in the Grower agreement and the program regulations, and any disputes by a customer over suspension or termination of their agreement shall be resolved pursuant to the program regulations.

CVWD will reimburse the participant for any volume of conserved water from the commencement of the participation period until the termination date of the Grower agreement. Understanding that unanticipated events may occur, a participant may elect to terminate their agreement. However, recognizing that Reclamation incentivizes for longer-term conservation efforts (\$330/af for one year vs. \$400/af for three years), the Grower agreement may require the participant to make reimbursement up to \$70/af for early termination (for example, if a participant terminates after the first year of a three-year agreement, but has already been paid).

#### **Payments for Conserved Water**

##### ***Actual Conserved Water***

Upon verification by CVWD of the volume of conserved water, CVWD shall pay the participant in the CRW Conservation Program according to the following schedule (all payments are net to participants):

- One-year agreement - \$270/af
- Two-year agreement - \$305/af
- Three-year agreement - \$340/af

These figures were calculated based on the payment from Reclamation minus \$60/af for CVWD's administrative costs. CVWD shall make payments twice per calendar year, which will be provided in the Grower agreement. If the participation period is for less than one calendar year payment, a single payment shall be made at the end of the participation period.

##### ***Use Credit for Satisfaction of Irrigation Water Availability Assessment***

As additional consideration for conservation, CVWD shall, for purposes of satisfying the Irrigation Water Availability Assessment (IWAA), presume a participant in the CRW Conservation Program has paid irrigation water service charges each month during the participation period as if the participant had used irrigation service for the land enrolled in the program. This is part of the administrative costs for which CVWD is reimbursed.

##### ***Invoices to Reclamation***

CVWD shall invoice Reclamation for conserved water in a timely manner for which payments have been made to a participant and shall provide supporting documentations of baseline calculation, verification and proof of volumes of conserved water.

#### **AMOUNT OF COLORADO RIVER SYSTEM WATER CONSERVED**

The CRW Conservation Program is not intended to be a long-term program and to permanently change or reduce agricultural land use designations; it is intended to operate temporarily, conserving up to 10,000 acre-feet per year (10 taf/yr) for a three-year term, CY 2023 through 2025. Any future extension of the CRW Conservation Program beyond the three-year term shall be contingent upon future approval and authorization by the Board.

The total volume of conserved water shall not exceed 10 taf per calendar year and shall not exceed 30 taf over the three-year life of the proposed plan. The volume of verified conserved water shall be deducted from CVWD's water orders and properly accounted for by Reclamation staff to ensure that it is not counted as underused water (e.g. underrun).

## **METHODOLOGY FOR ESTIMATED CONSUMPTIVE USE REDUCTION AND SUPPORTING INFORMATION THAT DOCUMENTS THE ESTIMATE**

CVWD shall, using CVWD's records, as supplemented by other available data, determine the historical baseline of water use for the land enrolled in the CRW Conservation Program for each month of the year. CVWD will review the monthly water use history for five calendar years preceding 2023 and if needed, solicit further information from participants regarding significant changes in water use during that period and the explanation for those changes.

CVWD will determine the Historical Baseline of Water Use for each month by using an average of three years of consumption, selected by dropping the lowest and highest consumption years. CVWD will provide participants and Reclamation with CVWD's written determination for the volume of conserved water for the payment period.

## **DESCRIPTION OF HOW THE PROPONENT WILL VERIFY AND DOCUMENT THE CONSUMPTIVE USE REDUCTION**

After an agreement for participation in the CRW Conservation Program has been signed by both a customer and CVWD's General Manager, the customer shall be deemed enrolled in the CRW Conservation Program.

- **Closure of Meters.** Irrigation service meters to lands enrolled in the CRW Conservation Program shall be locked by CVWD staff at the beginning of the participation period. Exception may be made in cases where this may not be practical, for example, where the method of conservation is crop substitution or if the meter serves multiple accounts not enrolled in the CRW Conservation Program.
- **Inspection of Land and Meters.** CVWD staff shall inspect irrigation service meters, well meters, and the land fallowed to ensure compliance with the agreement during the following times:
  - (1) Commencement of the participation period
  - (2) Mid-term
  - (3) End of the participation period, and
  - (4) Randomly, as needed
- **Verification of bills.** CVWD staff shall conduct quarterly or as often as needed reviews of the participant's canal water bills as part of the verification process.
- **Determination of Volume of Conserved Water.** CVWD shall calculate the volume of conserved water as follows:
  1. Canal water consumption data: CVWD staff shall generate canal water consumption report for all lands/meters (including those that are not enrolled in the CRW Conservation Program) owned and/or leased by the participant, for the period for which the participant shall be reimbursed for conserved water. Reimbursement shall be determined using the historical baseline of water use for each month and subtracting the volume of water that was applied to the participant's land in each month during the participation period. Calculations shall include all lands (including those that are not enrolled in the CRW Conservation Program) owned and/or leased by the participant.
  2. Well production data: CVWD shall generate well production report for all lands/meters (including those that are not enrolled in the CRW Conservation Program) owned and/or leased by the participant, for the period for which the participant shall be reimbursed for conserved water. The well production for all lands (including those that are not enrolled in the CRW Conservation Program) owned and/or leased by the participant shall not increase during the participation period.
    - ✓ If there is no significant change in in well production during the participation period as compared to the well production history, calculated in the same manner as for the canal water use, the volume of conserved water shall be equal to the volume calculated in 1.) above.

- ✓ If there is an increase in well production during the participation period as compared to the well production history, the volume of conserved water shall be equal to the volume calculated in 1.) above less the increase in well production.
- ✓ If there is a decrease in well production during the participation period, the volume of conserved water shall be equal to the volume calculated in 1.) above.
- 3. CVWD staff shall review the calculations and methodology used to determine the volume of conserved water with the participant and the participant shall sign off on the agreed volume prior to initiating any payment.
- **Resolution of Disputes.** Any dispute by the participant over the volume of conserved water determined shall be resolved pursuant to sections 14.4 (Appeals) and 14.5 (Exhaustion of Administrative Remedies) of Part 14 of CVWD's Canal Irrigation and Drainage System Rules and Regulations.

## **EXHIBIT 3**

# **PROPOSAL FOR A THOMAS E. LEVY REPLENISHMENT FACILITY RECHARGE CURTAILMENT PROGRAM**

## **PLAN DESCRIPTION**

### **Purpose**

To assist in a coordinated effort to protect critical reservoir water levels in the Colorado River Basin during the current drought, Coachella Valley Water District (CVWD) is considering establishing a Thomas E. Levy Replenishment Facility Recharge Curtailment Program (TEL Curtailment Program) to reduce the consumptive use of Colorado River water for a three-year term for calendar years (CYs) 2023 through 2025. The TEL Curtailment Program consists of the voluntary, temporary, and compensated conservation of Colorado River water historically used for recharge at Thomas E. Levy Replenishment Facility (Levy Facility), which is one of CVWD's recharge facilities. The conserved water shall not be consumptively used by CVWD or other Colorado River contractors and shall instead be made available by forbearance to assist in the management of reservoir levels in the Colorado River in the Lower Basin during the current drought conditions.

### **CVWD Responsibilities**

If the proposal is accepted, CVWD, upon authorization by the Board and compliance with the California Environmental Quality Act (CEQA), will execute a system conservation agreement with the U.S Bureau of Reclamation (Reclamation) and agree not to divert the conserved water under the TEL Curtailment Program.

CVWD shall cease replenishment at the Levy Facility in CY 2023 through 2025 to generate between 25,000 and 35,000 acre-feet per year (25 to 35 taf/yr), so that the volume of water conserved for all CVWD's programs enrolled under Reclamation's Lower Colorado Conservation Program (LC Conservation Program) total 35 taf/yr.

### **Reclamation Responsibilities**

Reclamation shall reimburse CVWD for the volume of actual verified conserved water at the fixed price.

### **Other Parties Responsibilities**

The Metropolitan Water District of Southern California and Imperial Irrigation District will need to agree to forbear diverting and using the water conserved under the TEL Curtailment Program.

## **AMOUNT OF COLORADO RIVER SYSTEM WATER CONSERVED**

The TEL Curtailment Program is not intended to be a long-term program and to permanently change or reduce recharge at the Levy Facility; it is intended to operate temporarily, conserving between 25 and 35 taf/yr for a three-year term, CY 2023 through 2025. Any future extension of the TEL Curtailment Program beyond the three-year term shall be contingent upon future approval and authorization by the Board. The Levy Facility shall be operated to augment the water conserved under other CVWD's programs enrolled in the LC Conservation Program so that CVWD's total conserved volume shall be 35 taf/yr.

The total volume of conserved water shall be up to 105 taf over three-year term of this proposed plan.

CVWD shall be reimbursed for the actual verified volume of conserved water. This volume shall be subsequently deducted from CVWD's future water orders and properly accounted for by Reclamation staff to ensure that it is not counted as underused water (e.g. underrun).

## **METHODOLOGY FOR ESTIMATED CONSUMPTIVE USE REDUCTION AND SUPPORTING INFORMATION THAT DOCUMENTS THE ESTIMATE**

Based on historical operation at the Levy Facility, it was determined that at least 35 taf/yr of water may be conserved through ceasing replenishment activities. The actual annual recharge volumes (by months) for the most recent five calendar years at the Levy Facility are shown in the table below.

<b>CY</b>	<b>Jan</b>	<b>Feb</b>	<b>Mar</b>	<b>Apr</b>	<b>May</b>	<b>Jun</b>	<b>Jul</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Total</b>
2017	3,362	2,951	3,165	2,831	3,124	3,089	3,216	2,886	3,075	3,176	3,185	554*	34,614
2018	157*	2,746	3,193	2,796	2,980	2,520	3,342	3,339	2,854	2,964	3,130	3,327	33,348
2019	3,186	2,148	3,171	3,032	3,231	3,192	3,069	3,250	2,962	3,102	2,875	2,925	36,143
2020	3,282	3,011	2,970	2,574	3,210	3,164	3,233	3,333	3,172	3,202	3,136	3,249	37,536
2021	3,300	2,978	2,951	3,104	3,248	3,217	3,352	3,038	3,103	3,241	3,149	3,290	37,971

*Note: \* In December 2017 and January 2018, Coachella Canal Lining Project was shut down for repairs; therefore, the volume of water that was replenishment during these two months was less than the average monthly replenishment volume of 3,200 af.*

**DESCRIPTION OF HOW THE PROPONENT WILL VERIFY AND DOCUMENT THE CONSUMPTIVE USE REDUCTION ON AN ANNUAL OR MORE FREQUENT BASIS, AS APPROPRIATE**

CVWD shall cease replenishment at the Levy Facility in CY 2023 through 2025 to conserve water to augment other CVWD programs enrolled in the LC Conservation Program to provide a total contribution of 35 taf/yr. This volume of conserved water shall be subsequently deducted from CVWD's future water orders and properly accounted for by Reclamation staff to ensure that it is not counted as underrun.