



Colorado Water Well Contractors Association

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Ms. Dianne E. Ray, CPA, MPA
Colorado State Auditor
State Services Building
1525 Sherman Street, 7th Floor
Denver, CO 80203t

February 10, 2017

RE: Request for Audit of the Water Well Inspection Program

Dear Ms. Ray,

The board of directors of the Colorado Water Well Contractors Association (CWWCA) has voted to request your office conduct both a performance and a financial audit of the water well inspection program operated by the Division of Water Resources in the Department of Natural Resources.

The program is authorized and operated pursuant to 37-91-101, et seq, Colorado Revised Statutes. To the knowledge of the CWWCA, the program has never undergone an audit of its operation or financial management.

The CWWCA is an organization comprised of contractors and individuals who are licensed to construct water wells and install pumping equipment to operate water wells.¹ The CWWCA was formed in 1931 and has endeavored to advance the science and engineering of water well construction and pump installation. Those efforts have included both continuing advancement of the education and skills of water well contractors and pump installers and also efforts to protect the groundwater of the state. A water well is not only an avenue for groundwater to be extracted for beneficial use. It is also an access point through which the aquifers and drinking water supplies can be compromised by the introduction of contaminants. The proper construction of water wells is one of the most important and basic elements in protecting the groundwater of the state.

The reasons for this request will be set forth in this letter. However, the CWWCA board wishes to make clear that this request should not be construed as a criticism of the professional staff who are dedicated to the administration of the well inspection program. The chief inspector and the two inspectors dedicated to the program are recognized as being high caliber professionals and have the respect of the members of the industry. Additionally, the CWWCA board wishes to make clear that this request is not a criticism of the Board of Examiners (BOE) which has responsibility for the licensing and education of persons subject to the program and the administration of the program. Both the BOE and the

¹ Licensing is conducted by the Board of Examiners of Water Well Construction and Pump Installation Contractors (BOE). The Board was created under 37-91-103, Colorado Revised Statutes.

professional staff have accomplished a great deal within the severe limitations that they face on a daily basis.

This request is made because the CWWCA board and members of the CWWCA are deeply concerned that the inspection program is inadequate to meet the purposes for which the statute was enacted. As will be discussed further on, the program has fallen short in the inspection of both water wells and the installation of the equipment needed to operate the well. This situation presents a clear threat to the groundwater of this state – the very conditions that the statute was enacted to prevent.

Enactment of SB03-045

The CWWCA was a strong supporter and advocate for the enactment of SB03-045 and remains committed to the purposes for which that law was enacted in 2003. SB03-045 was intended to stabilize and improve the inspection of the construction of water wells. Unfortunately, the reality is that approximately 80% to 90% of the new well installations are never inspected by the State of Colorado. It is that deficiency that has led the board of the CWWCA to request your office conduct both a performance and also a financial audit of the program.

With certain exceptions set forth in statute, every water well which is to be constructed must have secured a permit from the State Water Engineer.² The owner of the well is responsible for securing the permit and paying required permitting fees. A well owner need only pay a one-time permit fee and the well may be operated in perpetuity under that permit without incurring any additional fees unless the owner applies for a change in the status of the well. As a matter of convenience, the contractor who is to drill the well customarily pays the permit fee and the well inspection fee and incorporates that cost (a total of \$100) into the project.

The Division of Water Resources publishes a list of the types of permits and their associated fees on the Division's web site. The most recent listing of the permits and associated fees is dated July 1, 2016. However, the listing does not indicate that a normal well permit of \$100 is composed of two separate elements. The fee for the well permit is \$60 and there is an additional one-time fee of \$40 which has been statutorily set to support the costs of inspection of the well. Only the Division can issue a permit and inspect the well for proper construction and proper installation of pumping equipment.

In 2003, the General Assembly enacted SB03-045.³ SB03-045 created the well inspection program as a new section 37-91-113. The costs of the well inspection program inspection program were to be paid through permit fees. The increased well permit fees were to be paid into a newly created well inspection cash fund. The Act created the new water well inspection cash fund under a conforming amendment to 37-80-111.5. Because this provision of law is fundamental to the purpose of this request, a portion of it is set out for convenience:

“37-80-111.5. Fees – water data bank cash fund – division of water resources publications cash fund – satellite monitoring system cash fund – ground water management cash fund – well

² A “well” is a term defined in statute at 37-91-102 (16). That definition is very broad and intended to be inclusive. The definition sets forth certain types of wells that are not included under the statute. The use of the word “well” in this letter is intended to mean and refer to the types of wells included under the statutory definition.

³ SB03-045 may be found in the Session Laws for 2003, Chapter 252, pages 1675-1686. The Act had an effective date of May 14, 2003.

inspection cash fund – created. (NOTE: Several lines omitted for brevity).....FORTY DOLLARS SHALL BE CREDITED TO THE WELL INSPECTION CASH FUND, WHICH FUND IS HEREBY CREATED. MONEYS IN THE WELL INSPECTION CASH FUND SHALL BE APPROPRIATED TO AND EXPENDED BY THE STATE ENGINEER FOR THE PURPOSES ESTABLISHED IN SECTION 37-91-113. ANY MONEYS CREDITED TO THE WELL INSPECTION CASH FUND AND UNEXPENDED AT THE END OF ANY GIVEN FISCAL YEAR SHALL REMAIN IN THE FUND AND SHALL NOT REVERT TO THE GENERAL FUND. ALL INTEREST DERIVED FROM THE DEPOSIT AND INVESTMENT OF THIS FUND SHALL REMAIN IN THE FUND AND SHALL NOT REVERT TO THE GENERAL FUND. (NOTE: Remaining language omitted for brevity).”

As noted in a preceding paragraph, SB03-045 created a new section 37-91-113 which established the well inspection program. Subsection (1) of that section states:

“37-91-113. Well inspection program. (1) THE STATE ENGINEER SHALL MONITOR COMPLIANCE WITH THIS ARTICLE, INCLUDING BY INSPECTING WATER WELL CONSTRUCTION AND PUMP INSTALLATION, AND MAY EMPLOY INSPECTORS FOR SUCH PURPOSE. THE COSTS OF SUCH MONITORING AND INSPECTION SHALL BE PAID FROM THE WELL INSPECTION CASH FUND CREATED BY SECTION 37-80-111.5.”

Subsection (3) of the section sets forth the intent and direction of the General Assembly with respect to performance of well inspections:

“(3) INSPECTORS SHALL ANNUALLY SPEND A MAJORITY OF THEIR TIME CONDUCTING FIELD INSPECTIONS AND A MINORITY OF THEIR TIME PREPARING AND EVALUATING REPORTS AND RELATED OFFICE WORK. DUTIES SHALL INCLUDE THE FOLLOWING:

- (a) WELL CONSTRUCTION AND PUMP INSTALLATION AND OBSERVATION;
- (b) COMPLIANCE INVESTIGATION;
- (c) EDUCATION AND OUTREACH;
- (d) INSPECTION AND OBSERVATION OF GEOTECHNICAL WELLS, OBSERVATION AND MONITORING WELLS, DEWATERING WELLS AND TEST HOLES;
- (e) FIELD INSPECTIONS OF EXISITNG WELLS AND PUMPS;
- (f) FIELD INSPECTIONS OF WELL AND HOLE PLUGGING AND ABANDONMENT; AND
- (g) STAFF SUPPORT FOR THE STATE ENGINEER AND BOARD.”

The state is subdivided into 7 water divisions with each division encompassing the jurisdictional authority of a Division Water Court. In addition to the 7 water divisions, the geographic area that encompasses the Denver Basin has separate and distinct administrative rules for the construction of water wells. Approximately 70% of the wells permitted and constructed each year are to provide for domestic use of the groundwater.

Wells are drilled in each of the divisions, but some divisions witness much more drilling activity than do other divisions. SB03-045 envisioned that there would be a total of 8 well inspectors which included a chief well inspector. For the past several years, the program has been operated under a chief well inspector with only 2 well inspectors. One inspector is based out of Alamosa and is dedicated to the needs of Division 3 (the Rio Grande River Basin). The other inspector is based out of Denver and is responsible for the rest of the state and its 6 other water divisions and the Denver Basin.

In the preparation of this letter, we reviewed the final fiscal note that was prepared for SB03-045. That fiscal note was dated March 13, 2003 and is available in the archives of the Legislative Council. The fiscal note was clear about the expected workload and the professional staff needed to meet the direction of the General Assembly expressed in SB03-045:

“Based upon the annual number of applications filed with the Division of Water Resources since 1995, the Division estimates that 7,500 permit applications will be filed annually starting in FY2003-04;

*The Division will inspect 1,400 well sites annually in the seven statewide water districts;

*The Division will require eight well inspectors; one for each of the six water districts and two for the Denver district; and,

*Well inspectors will be required to inspect and observe well construction, investigate complaints, provide public education and outreach, inspect existing wells, and provide staff support to the Board.”⁴

The number of new well permit applications reflects the economic conditions of the state. When the state economy is strong and vibrant, there are many well permits requested and wells installed. The year 2002, for example, witnessed 13,608 applications. By contrast when the state slid into the national recession the number of applications decreased to 4,483 for 2011. The period of 2002 also reflected the onset of an extremely pervasive drought which caused water users to seek groundwater resources to offset the decrease in precipitation and surface water supplies. In more recent years, the surface water supplies have made a modest recovery and that, in turn, has also affected the number of permits that were requested.⁵

Attached to this letter are charts that display the activity of well construction.

One chart displays the number of well permit applications received by the Division of Water Resources for the years 2000-2015. The chart shows that the number of applications has increased modestly from its low of 4,483 in 2011 to slightly over 5,000 each year. The final fiscal analysis prepared for SB03-045 was predicated on over 7,500 permit applications per year, which has turned out not to be realistic. Planning for 5,000 new well permits per year seems reasonable and supportable based on real-world experience.

Another chart displays the number of well completions and inspections for the period 2011-2015. The number of well completions shows fewer wells than the number of permit applications for several reasons. First, some permits are denied. Second, some wells are never drilled or constructed. Third, some permits are requested to authorize new uses of an existing well. And, fourth, proper completion forms are not always submitted. This information is displayed for the respective water divisions (and the Denver Basin) and compares the number of inspections in relation to the number of well

⁴ Revised Fiscal Impact, SB03-045 Colorado Legislative Council, dated March 13, 2003 page 4. The bill was pending consideration by House Appropriations. The Joint Budget Committee staff issued a concurrence with the final fiscal impact analysis.

⁵ These numbers were secured from the State Engineer’s office and were used for a presentation by CWWCA to the Water Resources Review Committee in the fall of 2016.

completions. This comparison is a stark display of how the inspection program has failed to meet even the most minimal standards of the statute.

The Criticality of Inspections

The total number of permit applications varies by year and the applications vary by water divisions throughout the state. The variability makes it difficult to plan staff resources so that inspectors are available and can travel to the well site in a timely manner. Staffing resources are currently totally inadequate to meet the demand for well inspections. Even if the two inspectors worked every single hour of every single working day, took no holidays, took no vacation and were never ill, they could not possibly meet the demand for inspections that faces them every day. When the element of travel time is added to their normal routine, it can easily be seen that having to move from one site to a distant site significantly reduces the effectiveness of the inspectors.

Unlike a produced good that may be inspected for quality and compliance with regulatory standards while it is still in inventory awaiting distribution, a water well must be inspected at the time its construction is underway. Once the well has been completed, it is not possible for the inspector to observe many of the critical stages of the construction or the actual techniques used by the driller. The standards for inspection are set forth in rules promulgated by the BOE and the current water well rules were revised and updated in September, 2016.

The issue as to when the inspection must occur is critical to this discussion and serves as the basis for the request for a performance audit. An inspector can inspect the seal and surface casing and height after construction. However, the critical need is during the drilling and installation of the casing and the pump and motor equipment. The inspector must observe the drilling and the installation of equipment. It is especially critical that the inspector observe the grout seal filling the annular space in the well to the surface. The seal must be properly done since it is the protection against contaminants entering the well at the surface. An improperly constructed seal will provide contaminants with access to the aquifer and water table that the well penetrates. In addition, the inspector needs to verify that the well has been completed solely in the aquifer for which it was permitted.

The importance of verifying the proper construction of a water well can be seen from the following information published by the American Groundwater Association. While the selection is a bit lengthy, it serves to emphasize the importance of proper construction:⁶

“Water wells, if properly constructed, can provide a safe and reliable source of drinking water. An essential aspect of proper well construction is sealing the space between the well casing and the side of the drilled hole (called the well annulus). Well casing should also have a vermin-proof vented-cap and penetrate the ground at least 20 feet. If bedrock is present, the casing should be drilled into unweathered rock at least 5 feet. Because well construction regulations vary from state to state, homeowners should check with local authorities (e.g., State water well boards, health departments or state-level environmental protection agencies) to determine the specific regulations that apply to domestic drinking water wells.

If unsealed, the well annulus could provide a direct pathway from the surface to the ground water below at a significantly fast pace compared to infiltration through undisturbed soil. If the

⁶ THE AMERICAN WELL OWNER, 2002, Number 4

natural cleansing process incumbent during infiltration is short-circuited through the annular space, bacteria and other contaminants may be introduced to the ground water.

Properly sealing a well casing involves filling the annulus with a material that will stop water from flowing down the side of the casing. The process of filling the annulus is called grouting. Grouting typically involves pumping cement and/or bentonite into the annular space starting at the bottom of the casing and filling back up to the surface. Starting the grouting process at the bottom of the hole reduces the possibility that air and water will be trapped in the space due to “bridging” and clogging conditions that commonly occur in the narrow portions of the annulus. To ensure that the annulus has enough space to accept grout without a high likelihood of clogging or having the casing touch the wall of the hole, the diameter of the drill hole should be 4 to 8 inches larger than the outside diameter of the well casing.

Bentonite is a clay that expands when mixed with water. When wet its volume increases by about 13 times compared to its volume when dry. This quality allows it to tightly fill small and irregular spaces between the casing and the hole wall. When mixed with cement the bentonite-cement-slurry creates a seal that is somewhat plastic so that it can absorb slight movement of the casing without cracking. The slurry is also more resistant than plain bentonite to washouts if high water content zones must be sealed. Cement by itself has a tendency to shrink as it cures and may pull away from the sides of the annular space. Shrinkage is especially likely if the cement is “mixed thin” with too much water. Also cement heats up significantly when it cures and so cement grout is not recommended for plastic or PVC well casing.

Drill cuttings (rock fragments released from the hole during drilling) are sometimes used as a backfill of the annular space. Although the drill cuttings are usually very small particles, they may not pack together well enough to provide the best seal for a well because of their composition, hard surfaces and shape. Grouting a drill hole may cost a little more initially, but it is a small price to pay compared to cleaning up a polluted well.”

The preceding selection is a clear statement of the importance of proper construction. In addition to construction, inspectors verify the quality of the installation of pump equipment and cisterns. The inspector verifies that the equipment has been properly disinfected, that cisterns are properly installed and that critically important backflow prevention has been correctly installed. The legislative declaration emphasizes these points:

“37-91-101. Legislative Declaration. (1) The general assembly hereby finds, determines and declares that:

- (a) It has been established by scientific evidence that improperly constructed wells, improperly abandoned wells, and improperly installed pumping equipment can adversely affect groundwater resources and the public health, safety and welfare; and,
- (b) Therefore, the proper location, construction, repair, and abandonment of wells, the proper installation and repair of pumping equipment, the licensing and regulation of persons engaging in the business of contracting either for the construction of wells or for the installation of pumping equipment, and the periodic inspection of well construction and pump installation are essential for the protection of the public health and the preservation of groundwater resources.”

The purpose of the inspection is to verify that proper techniques and materials were used. However, if an inspection does not occur, there can be no reasonable certainty that the well was properly constructed or that essential pumping equipment was properly installed. Inspections are the critical verification and validation of proper construction so that the aquifer and associated groundwater are protected from intrusions of contaminants that would jeopardize drinking water, water applied to crops and livestock and other beneficial uses of the extracted groundwater. It should be remembered that a water well is intended to be used for many, many years – municipal drinking water wells are intended to operate in perpetuity. The well must be constructed to not only ensure reliable continued use. It must also be constructed to protect the quality and integrity of the aquifer and the water supply.

An aquifer has many wells that tap its groundwater resources. Well owners make significant capital investments in their wells and, while it is rare, some municipal wells are known to have cost upwards of a million dollars. If an improperly constructed well fails and allows contaminants to enter the water table and impact the aquifer, the resulting effect will likely be on many wells that utilize that aquifer. Groundwater travels through the aquifer. An improperly constructed well that allows contaminants to reach the aquifer puts wells miles away from the failed well at risk. Although it was not the result of a well failure, the recent contamination of the aquifer in El Paso County from firefighting chemicals affected hundreds of wells and will cost hundreds of millions of dollars to remedy. This example is a testament to the interconnectedness of multiple wells in the same aquifer.

Inspection Program Falling Short

The professional staff responsible for the implementation of the well inspection program prepares and submits a regular report to the BOE which displays the number of well completions, inspections, water division affected and related information.⁷ Those reports are in the public domain and are maintained by the BOE staff. A recent report shows that less than 10% of the wells were inspected which means that more than 90% were not inspected. For every 2,000 wells constructed in a year, approximately 200 are inspected while 1,800 are not inspected. The real-world effect grows each year as the cumulative number of inspected wells remains relatively constant but the number of uninspected wells grows from 1,800 to 3,600 to 5,400 and so on.

This accumulating inspection deficit does not exist as a backlog that can be eliminated through subsequent inspections. Once the well is completed and sealed and the equipment installed, the opportunity for an inspector to determine whether it was constructed properly is simply gone. And as a practical matter without belaboring the point, if there are inadequate resources to inspect current well drilling operations, it is simply not possible to reach back and inspect wells that have been completed and the drilling operations ceased. There is a backlog of uninspected water wells but there is no real way to provide inspections retrospectively.

As a practical matter, a well which is not inspected will never be inspected absent either a catastrophic failure of the well or the owner seeking to change the nature and purpose of the permit. The owner does not receive a statement or a certificate of inspection from the Division of Water Resources that the well was inspected. More important, the owner does not receive a statement from the DWR that the well was not inspected. The owner may assume in good faith that the \$40 inspection fee that was paid ensures that the State will, in fact, inspect the well prior to it being approved for operation. The result of this continuing issue of non-inspection is that an uninspected well simply goes into operation and the

⁷ One such report is attached to this letter.

owner of the well begins to extract and use the water. It is not an exaggeration to note that there are several thousand drinking water wells in operation throughout Colorado that were not inspected by the State. These wells are relied upon by the owners for daily drinking water needs without the owner knowing that the well was not inspected.

If there were 5,000 permits issued, the aggregate amount of inspection fees paid to the DWR would be \$200,000. However, if only 400 inspections were actually performed, that represents only \$16,000 in fee revenue. The well owners who paid some \$184,000 in fees received no inspection services from the DWR. While this example is alarming, there is a rationale for the disparity. To be in compliance with SB03-045, the fees generated from the \$40 per well inspection fee go to the support of the inspection program. There are economies of scale associated with establishing and maintaining a professional cadre to accomplish the inspections. It would be impossible for the inspection program to survive solely on the fees generated from the permitted wells that are actually inspected.

However, given the lack of professional staff resources, the DWR only has a single option for inspection. That single option is to inspect some subset or sample of the wells under construction. Because of the variation of permits basin-by-basin it stands to reason that some basins would experience only a few inspections. As can be seen from an accompanying chart, Division 6 did not have an inspection in either 2011 or 2012. Notwithstanding the reality of committing scarce professional resources to a limited number of wells under construction, all applicants for a well permit must pay the \$40 fee for the well inspection program.

Before setting forth the specific recommendations, the CWWCA board wants to again emphasize that these recommendations do not reflect any criticism or dissatisfaction with the professional work or integrity of the current chief inspector or the two inspectors. In fact, the CWWCA board commends them for their diligence and commitment to high professional standards under circumstances that preclude them from being able to conduct the well inspections that were contemplated in SB03-045.

RECOMMENDATIONS:

The CWWCA board recommends and requests that your office initiate and conduct both a performance audit and also a financial audit of the water well inspection program.

The plain language of SB03-045 is premised on the inspection of each well that is permitted and constructed. That statutory direction of the General Assembly is simply not occurring. With resources that are stretched to the point that the professional staff can conduct inspections on fewer than 10% of the permitted wells, the well inspection program is a failure:

*The CWWCA board believes that the performance audit should address the essential question of what is the optimum level of professional staff needed to service the inspections required in accordance with SB03-045 in a timely manner. For the CWWCA board, this is an issue of resources. The demand for inspection services is clear and can be documented from the number of water well permits requested and issued. The deficiency is that an adequate supply of professional inspection services is simply non-existent. The State of Colorado is not meeting its statutory obligation to inspect water wells as called for in SB03-045.

*In addition, the CWWCA board believes that the performance audit should determine how the inspectors should be organized to provide inspection services to the entire state on a timely basis. The current allocation of an inspector dedicated to the Rio Grande Basin and the other

inspector being responsible for all the other basins in the state is irrational and guarantees that inspections will not be made. In addition, the single inspector who provides service to the six basins outside the Rio Grande Basin cannot accomplish even minimal professional services without expending inordinate amounts of time traversing those six basins.

Water Division 3 is an anomaly. There are compelling reasons why that division has received such an intense commitment of resources. But with only 2 inspectors, the disproportionate needs of Water Division 3 have simply exacerbated the lack of inspection in the other 6 basins and the Denver Basin. It is self-evident that if only one person is responsible for the entire state outside Water Division 3, that inspector cannot be expected to be able to travel from site to site with any rational expectation of being able to meet the demand for inspections.

SB03-045 is very clear in that it requires the cost of the inspection program to be paid by fees that are applied to each water well permit. What is also very clear is that with only a small percentage of inspections being conducted the vast majority of water well owners are paying fees for a statutorily mandated service that is never provided – and cannot be provided - by the State of Colorado.

The CWWCA board believes that the financial audit should address several critical issues:

*Given an optimum level of staffing and statewide presence, is the \$40 fee set forth in statute adequate to fund the operational needs of the water well inspection program? If the current \$40 fee is determined to be inadequate, what should the fee be? The \$40 fee was set in statute in 2003 and was set in 2003 dollars. It was also predicated on the anomaly of the high number of well permits filed in 2002. Based on that number of permits, the gross fee revenue would have been \$520,000. However, the number of permits has declined and stabilized at approximately 5,000 per year which represents \$200,000 in aggregate fees – less than half the amount anticipated when SB03-045 was enacted.

*Given the variability of water well construction over time, should the inspection fee be set by statute or should the Board of Examiners of Water Well Construction and Pump Examiners be tasked with the responsibility for setting a schedule of fees by rule of the BOE?

*Given the lack of a conspicuous regulatory presence in the field, is there a likelihood that water wells are being constructed, redrilled or otherwise altered either without a permit or by unlicensed contractors? There is anecdotal evidence that such things are occurring but the DWR lacks the resources to effectively interdict such activity. It is generally considered that a conspicuous presence of agents of regulatory agencies provides what is known as a “sentinel effect.” A sentinel effect occurs when those subject to a regulatory program are aware that they might be visited by an inspector at any time and that causes them to be more diligent in their activities.

*It is of great concern that the intent of SB03-045 was to rely on inspection fees to pay for the program but that the State persistently chooses to not appropriate all the fee revenue for the operation of the program. The CWWCA board understands and appreciates the accounting dilemma of cash fee revenues under the TABOR amendment. However, the board believes that the State should reprioritize the inspection program to be one of high priority. The program has failed. Those who pay the inspection fee are not being given the service that they are required to pay for and the groundwater of the state is made vulnerable to contamination through

improperly constructed water wells. Without an alignment of the demand for inspections and the supply of inspectors, the inspection program's failure will compound and will constitute an ongoing and imminent threat to the water quality of the state's scarce groundwater resources.

The board and members of the CWWCA appreciate your consideration of this request. We would be happy to meet with you and the Legislative Audit Committee to discuss the program and its shortcomings further. In order to avoid making this request letter being unduly long and complex, we did not include or attach information and documents that would further illustrate the real world problems associated with the lack of inspections. If it would help you and the members of the Legislative Audit Committee, we can provide a down-hole video that shows casing failure on a well that is less than 10-years old. The cause of the failure was likely improper grouting. In addition, we can provide some examples of wells with improper surface seals. Our members and the board of directors have extensive experience and we would be glad to share that with you and the Committee.

Please let us know what more we can do to assist you in your review of this request. For convenience, we have listed individuals that you can contact who would be able to process needed information and respond quickly to your needs:

Mr. Joe V. Meigs, CWWCA Legislative Chairman / Senior Project Manager, Lytle Water Solutions, LLC, 303-968-6244 (cell) and joe@lytlewater.com

Ms. Karie Walker, CWWCA Executive Director, 303-759-2294 (office) and execdir@cwvca.org

Mr. Dick Brown, CWWCA Legislative Liaison, 303-601-9254 (cell) and dickscuba@gmail.com

Sincerely,



Bryan Beckner

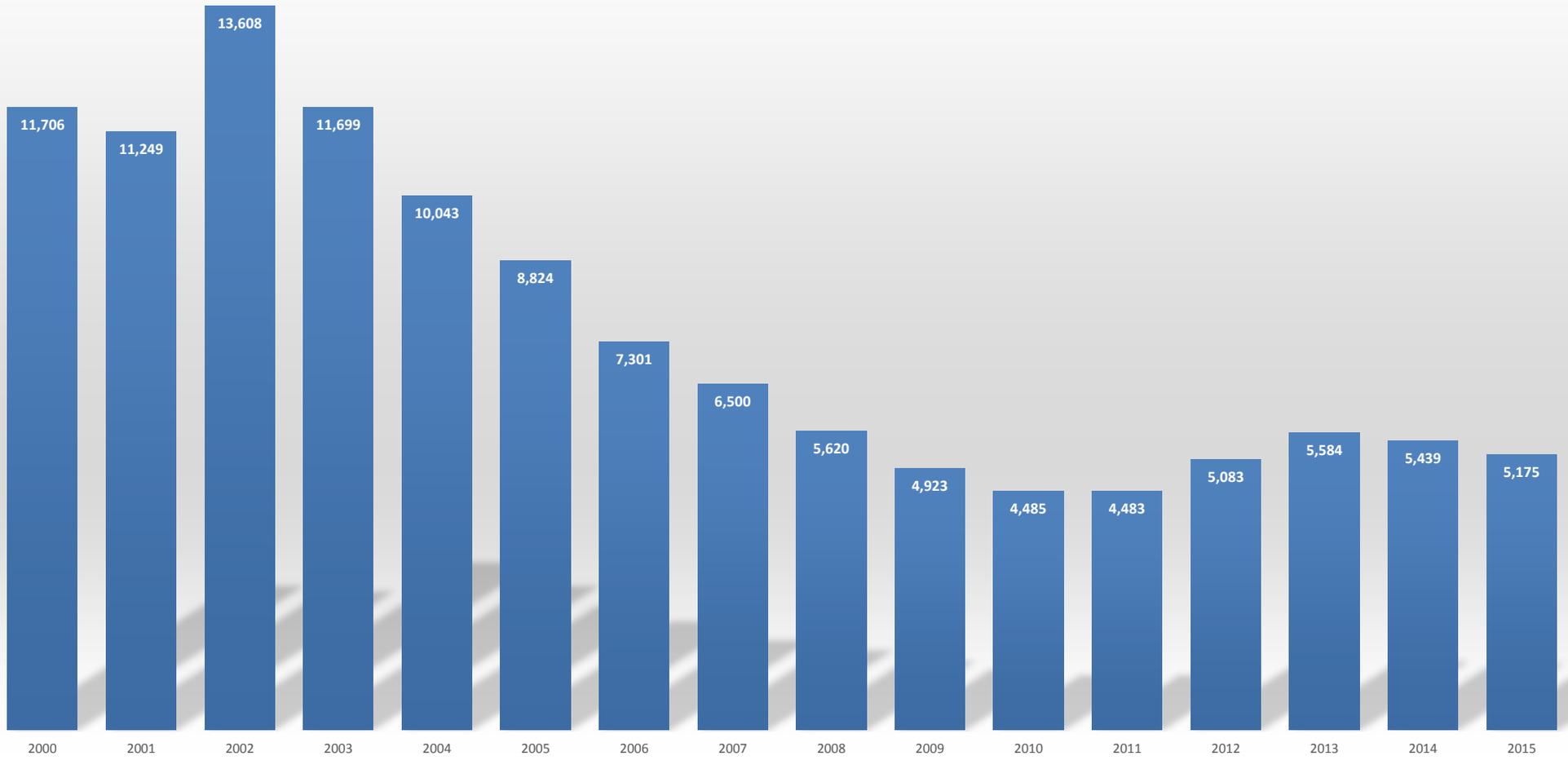
CWWCA President

cc: Members of the Legislative Audit Committee

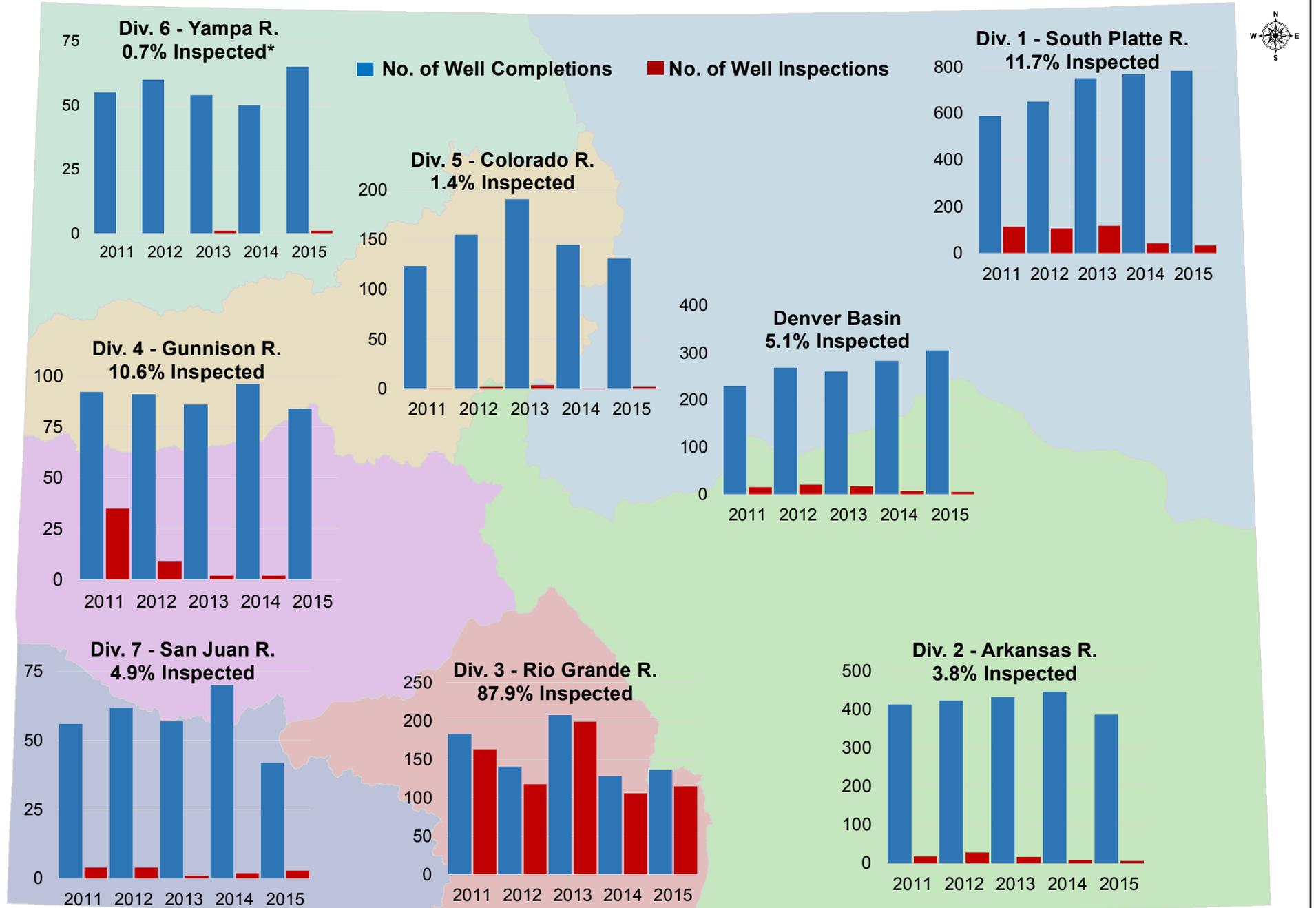
Mr. Dick Wolfe, State Engineer

Ms. Theresa Jenn-Dellaport, Chairman of the Board of Examiners

DWR Permit Applications Received for the Year 2000 through 2015



2011 - 2015 Colorado Well Completions and Inspections



*April & May 2015 Based upon information from Board of Examiners Div. 6 representative. Data Source: CWWCA, CDSS, CDOT Date: 1/16/2017