

1 A (Mr. Woomer) I'm just here to discuss the
2 situation with the water system in Hobbs, the City of
3 Hobbs, and its ability to deliver water and willingness to
4 deliver water to the NEF site.

5 Q Uh-huh. Are you going to testify as an expert
6 on any matters involving the availability of the water to
7 Hobbs to resell?

8 A (Mr. Woomer) I'll be testifying about the
9 knowledge that I have on the Hobbs water system and the
10 ability for Hobbs to deliver the required GPD to the plant
11 site.

12 Q Okay. Well, essentially what are your
13 conclusions going to be?

14 A (Mr. Woomer) My conclusions are that Hobbs has
15 the water rights and the water available and the systems
16 available to deliver the water required by the NEF site.

17 Q And how much water is required by NEF site?

18 A (Mr. Woomer) The requirements for the NEF on
19 what we've been looking at is 65,000 gallons per day,
20 approximately 72 acre-feet per year.

21 Q And what is the duration of that requirement?

22 A (Mr. Woomer) A 30-year period.

23 Q And what investigation have you undertaken to
24 determine that Hobbs has the rights on the water and the
25 systems to deliver that amount?

IN THE MATTER OF LOUISIANA ENERGY SERVICE
Docket No. 70-3123-ML Official Exhibit No. 79
OFFERED by: Applicant/Licensee Intervenor NZRS/PC
NRC Staff Other
IDENTIFIED on _____ Witness/Panel _____
Action Taken: ADMITTED REJECTED WITHDRAWN
Reporter/Clerk

1 A (Mr. Woomer) Hobbs holds the right to 20,066.4
2 acre-feet of water. We are currently using between -- a
3 little less than 8,000 acre-feet per year.

4 Q Is that all you've done?

5 A (Mr. Woomer) The 72 acre-feet per year
6 probably equates to less than 1 percent of our total
7 usage.

8 Q Uh-huh.

9 A (Mr. Woomer) Which is minimis.

10 Q Have you done any calculations of what the
11 situation will be, say, 30 years after the plant begins
12 operation?

13 A (Mr. Woomer) I have not done any calculations
14 personally. We do have a 20-year plan that accounts for
15 population growth of about 1.4 percent per year. And it
16 describes the system that would be needed at that time.

17 Q And -- all right. Twenty years out, what will
18 the water usage of the Hobbs system be?

19 A (Mr. Woomer) I can't recall exactly what that
20 number is.

21 Q Do you remember what it -- well, is there any
22 projection for what it will be 30 years out?

23 A (Mr. Woomer) For 30 years out?

24 Q Yes.

25 A (Mr. Woomer) No, sir.

1 Q You don't know. And are there any projections
2 of what water will actually be available to Hobbs, say, 20
3 years out, as distinguished from rights?

4 A (Mr. Woomer) For 30 years out? No, sir.

5 Q Twenty --

6 A (Mr. Woomer) Oh, 20? No, sir.

7 Q The question is to 20. Okay.

8 A (Mr. Woomer) No.

9 Q Mr. Stokes --

10 A (Mr. Stokes) Yes, sir.

11 Q Can you give us the substance of the facts and
12 opinions you propose to testify to the Board about?

13 A (Mr. Stokes) Facts and opinions: The fact
14 that the City of Eunice has 4,003 acre-feet of random
15 water rights as recognized by the State Engineer Office.
16 Current usage or usage in 2000, metered usage, was just a
17 little over 2,000 acre-feet per year, and the provision of
18 an additional 75 acre-feet per year water to the site
19 could be done with no problem to the water rights or the
20 well capacities. And that the provision of water by the
21 municipalities to the facility is authorized under Chapter
22 3 of the statutes.

23 Q Have you done any estimates of the ability of
24 Eunice to deliver water to the NEF out, say, 30 years from
25 today?

1 A (Mr. Stokes) The -- I have done so straight
2 calculations. The 40-year water plan has information in
3 it dealing with the wells and the rights -- when those
4 rights are permitted, the administration of those rights
5 are done on a 40-year period, and there will be water,
6 according to the State Engineer administrative policy, for
7 water to be available for 30 years. The State Engineer
8 does those calculations. I don't.

9 Q So it's his problem then.

10 A (Mr. Stokes) No. It is based -- the supply of
11 water is based upon the administrative criteria and the
12 models developed by the State Engineer Office.

13 Q Okay. So they've done that model.

14 A (Mr. Stokes) That's correct.

15 Q And you're relying on their model in that
16 respect.

17 A (Mr. Stokes) The water rights -- the modeling
18 was done to ensure the viability of the 4,000 acre-feet of
19 withdrawals, and the additional 75 acre-feet fits very
20 well into that 4,000 number.

21 Q Okay. You speak of a 40-year water plan. What
22 is this plan?

23 A (Mr. Stokes) The regional plan that you have
24 in front of you.

25 Q The Lea County plan.

1 A (Mr. Stokes) That's correct.

2 Q Okay. Are you going to offer testimony on any
3 other subjects in this proceeding, other than what you've
4 just described?

5 A (Mr. Stokes) Only if I'm asked.

6 Q Okay. Do you know if the City of Eunice or the
7 utility for the City of Eunice has entered into a
8 commitment to deliver water to the NEF?

9 A (Mr. Stokes) I believe that Mr. Krich is
10 probably the person to answer that question, as he has
11 been in negotiations with the City of Eunice and with
12 Hobbs.

13 Q Okay. Mr. Campbell, can you tell us the
14 substance of the opinions and facts that you're going to
15 testify to the Board about in this case?

16 A (Mr. Campbell) I'll be testifying in regards
17 to what Lockwood Greene did to determine the water usage
18 for the facility. We were also somewhat instrumental in
19 determining the source of water, i.e., Eunice and Hobbs.
20 I will discuss that if necessary and any other things that
21 I may be asked to discuss.

22 Q Okay. Well, what are you going to testify to
23 about the efforts of Lockwood Greene to identify the water
24 demand?

25 A (Mr. Campbell) We will discuss the methodology

1 BY MR. LOVEJOY:

2 Q What was that number? Sorry.

3 A (Mr. Peery) 31 million acre-feet. If you
4 compare LES's needs to that quantity, you're looking at
5 well less than .01 percent of available water from the Lea
6 County Underground Water Basin.

7 Q And what amount would be in storage in, say,
8 20/40?

9 A (Mr. Peery) I would have to look at that.
10 (Perusing document.)

11 Referring to your highlighted section, it says,
12 "It follows that approximately only 8 million acre-feet of
13 recoverable water will exist in 2040 if continuation of
14 1998 pumping rates occur. The bulk of this figure will
15 also probably be located away from existing well fields
16 due to drawdown in the aquifer." So it still is a
17 substantial amount of water.

18 Q And would --

19 A (Mr. Peery) And that 8 million acre-feet of
20 recoverable water was taken as 45 percent of the water in
21 storage. So it says here, "Approximately 14 million acre-
22 feet of water would still be in storage, 8 million
23 recoverable." So still a significant quantity.

24 Q And would your calculation as to the extent of
25 drawdown attributable to the facility be the same under

1 those circumstances, the ones you just referred to?

2 A (Mr. Peery) It would be specific to the
3 drawdown at the particular site, so I would have to look
4 at the projected drawdown at the end of the 40-year period
5 and calculate that.

6 Q You'd have to do a new calculation. Is that
7 right?

8 A (Mr. Peery) I'd have to review my
9 calculation --

10 Q Would your --

11 A (Mr. Peery) -- because those drawdowns don't
12 occur evenly throughout the basin, so that's the important
13 thing to know.

14 Q Would the figure you used for transmissivity be
15 the same if there were significant drawdowns as described
16 in the document?

17 A (Mr. Peery) Since I already started with a
18 conservative transmissivity, I'm not sure.

19 Q Okay. Were there -- in the calculations you
20 did, were there any boundary conditions with respect to
21 the single well that you've assumed?

22 A (Mr. Peery) No.

23 Q Nothing. Okay.

24 A (Mr. Peery) Again, looking at one well -- I
25 mean, you're talking about all the water coming out of one