

Exhibit 19

Further Excerpts from
Deposition of David Wiley
(September 26, 2017)

In the Matter Of:
STATE OF MISSISSIPPI vs
STATE OF TENNESSEE
OF TENNESSEE,

DAVID WILEY
September 26, 2017



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1 percent of that would stay in the state for
2 these long periods of time.

3 Q. (BY MR. HILL) The period of time that
4 you determined recharge and outflow is for one
5 year?

6 A. Yes.

7 Q. That's annually?

8 A. Yes.

9 Q. So what you are really saying is that
10 annually 16 percent of the amount that recharges
11 the aquifer within Mississippi flows out of the
12 aquifer?

13 A. No.

14 MR. ELLINGBURG: Objection to form.

15 A. No. No. I don't know how long that
16 16 percent takes to flow out.

17 Q. (BY MR. HILL) That's not an on annual
18 outflow?

19 A. No.

20 Q. So how can you compare an outflow that
21 is not annual to a recharge?

22 A. I take that back. In the water budget
23 that 16 percent would be in this case assumed to
24 have left within that one year.

1 Q. Okay. So it is the case, even if it is
2 not the exact same water, 16 percent of the
3 amount that is annually recharged is leaving the
4 aquifer to other states within that same year?

5 MR. ELLINGBURG: Objection to form.

6 A. Approximately 16 percent in that
7 one-year simulation didn't -- it left the state
8 in that one-year period. When I say that, we're
9 talking in all directions. That's a big area.
10 It is a lot of square miles. It is a small
11 amount of water in any one direction.

12 Q. (BY MR. HILL) Sure. You base this 16
13 percent on the MERAS model. Is that right?

14 A. That's correct.

15 Q. Do you think that number is correct?

16 A. Yes. The model produces these numbers.
17 We are looking at a calibrated model. I have
18 confidence that the number is correct.

19 Q. I'm asking if you think the model is
20 reliable when it determines that this is the
21 number.

22 A. Yes.

23 Q. You testified earlier that you used the
24 Brahana and Broshears 2001 model as a basis for