

**Robert Carrington, PLS representing the Nevada Association of Land Surveyors.**

At the Public Meeting conducted on August 26, 2025 to discuss changes to NAC 522, the meeting was attended by Consultants from Geothermal & Materials, Geologist, Clean Air Task Force and Energy Companies.

Those in attendance discussed issues concerning the release of natural gas during the well drilling and that any release would constitute a violation of regulations.

They also discussed the size of sampling cores and that the hydraulic fracking is not clearly addressed in the proposed changes.

There were additional discussions on NAC 534A Geothermal Resources although not germane to today's meeting.

This meeting today is to discuss specific changes to NAC 522.

These changes include references to Casing and Tubing, Cement Materials for Well Drilling and the removal of a requirement for a location plat to be prepared by a Land Surveyor Licensed in Nevada.

During that public meeting on August 26, 2025, not one of the consultants mention that removing the need for a Land Surveyor to prepare a location plat was warranted, they also did not mention that it was a financial burden to continue this practice.

Land surveyors are crucial in Nevada for locating, mapping, and approving well locations to ensure compliance with strict state water laws, specifically in the preparation of water right maps. While a licensed well driller physically constructs the well, a **State Water Right Surveyor** or a licensed professional land surveyor is often required to accurately determine the legal location of the well, especially for water rights applications, monitoring wells, or with boundary locations. Water Rights maps also requirement to tie the Well to Sectionalized Land Corners.

The Division of Materials Form 2 requires that the applicant list the Well Number, The Quarter/Quarter of the Section, the Section, the Township

and Range as well as the distance from either the North/South and East/West Section lines and the distance/direction to the nearest town.

A lot of the Surveys of Nevada were performed by the Federal Government or by Government Contract Surveyors in the 1880's and have not been Dependently resurveyed. Those original Surveyors, set stones and or posts which are described in the survey notes and are sometimes hard to recover by even experienced land surveyors, much less those without knowledge of Public Land Survey System.

Recently a surveyor preparing a Water Rights Map to locate a point of well that fell in an unsurveyed township, during the course of the survey, they had to tie the location of the well to an adjoining township corner that was 28 miles away. This could not have been done without the knowledge and use of specialized Land Surveying Equipment.

Additionally, the act of locating fixed works falls within NRS 625.040 Practice of Land Surveying, defined. A well drilled in the earth would be considered fixed works.

Surveyors are required to have the necessary Education and Experience and must pass both National and a State Specific Exam to be able to be licensed to perform Professional Land Surveying.

In conclusion, with the requirement to accurately locate a well as required by state and federal agencies and now on Form 2 of the Division of Materials requiring ties to Sectionalize Land Corners, we at the Nevada Association of Land Surveyors feel that the removal of the requirement for a Location Plat prepared by a Licensed Land Surveyor could be a risk to the life, health and safety of Nevadan's and not meet the needs of Agencies requesting the location data.