

MEMORANDUM

To: Water Right File: 37-22252, 37-22313, 37-22318, 37-22323
From: Ashley Ritter
Date: March 15, 2021
Re: Annual Reporting Requirements Review

Intro

On February 10, 2021, the Idaho Department of Water Resources (IDWR) received the Aquifer Recharge and Pumping Report for 2020, Dry Lot LLC, with regards to the above mentioned water rights (37-22252 is a license, 37-22313, 37-22318, 37-22323 are included in transfer 74449). The report was submitted by Erick Powell with Brockway Engineering on behalf of the right holder, Dry Lot LLC.

Water right 37-22252 condition two (2) states:

“By January 31 of each year the right holder shall report to the Department:

- a) The volume of water diverted from the authorized points of diversion for each month of the prior calendar year,
- b) The number and location (by subdivision lot number) of the acres of land irrigated in connection with the right during the prior calendar year, and
- c) The number and location (by subdivision lot number) of the homes served domestic water from the authorized points of diversion pursuant to other rights during the prior calendar year.”

Transfer 74449 (includes 37-22313, 37-22318, and 37-22323) condition five (5) requires the amount of water injected for ground water recharge to be reported and submitted annually.

Review of report

Dry Lot LLC rights 37-22313, 37-22318, and 37-22323 authorize the recharge of up to 75.4 acre-feet (AF) of water from the Big Wood River through the adjacent Hiawatha Canal and Valley Club golf course irrigation system. Water right 37-22252 authorizes the extraction of irrigation water from the existing Valley Club Home Owners Association's wells for the irrigation of up to 27.5 acres anywhere within 99 currently platted subdivision lots.

It is reported that in in 2020, 347.4 AF (an increase of 73.6 AF over 2019) of water was pumped from the Valley Club HOA wells (East & West wells combined) for domestic and irrigation uses associated with 52 residences (individual lot numbers and monthly diversion volumes included in report) within the Valley Club subdivision. (Water right 37-21337 also uses the Valley Club wells as diversion points and estimated usage was 33.0 AF). The report noted that the reason for the increase when compared to 2019 is unknown, although there may be reason to believe that the existing in-line meters associated with the two HOA wells may be inaccurate and are reporting erroneously high diversion volumes.

IDWR emailed Brockway Engineering on March 11, 2021, to inquire if there are any future plans for calibration and if necessary replacement of the meters to better ensure correct

meter readouts, thus ensuring a more accurate representation of the reported data. Brockway Engineering responded on March 12, 2021, that they (Brockway Engineering) are looking in to checking the accuracy of the existing meters and will determine whether or not they will be replaced.

The total diversion volume associated with the irrigation of 33 lots (under water right 37-22252) was reported as 75.4 acre-feet with the irrigation of 27.5 acres, which requires 75.4 acre-feet to be infiltrated. In 2020, 29.6 AF were recharged before June 1st and 47.7 AF of water was recharged from that date through July 17th in the two Dry Lot LLC Basins, leaving an excess of 1.9 AF infiltrated.

Dry Lot LLC daily infiltration volumes were submitted attached to the 2020 Aquifer Recharge and Pumping Report.

Conclusions

The 2020 Aquifer Recharge and Pumping Report for water rights 37-22252, 37-22313, 37-22318, and 37-22323 has been reviewed, and reporting requirements for the above water rights have been satisfied

Ritter, Ashley

From: Zach Latham <zach.latham@brockwayeng.com>
Sent: Friday, March 12, 2021 4:07 PM
To: Ritter, Ashley; erick.powell@brockwayeng.com
Cc: Woody Friedlander; Darrell Rubel
Subject: RE: 2020 Dry Lot LLC Yearly Report

Ashley-

Thank you for the email. We are looking into checking the accuracy of the existing meters and will determine whether or not they will be replaced. We will let you know what transpires. Thanks and have a great weekend-

Zach Latham

Hydrologist
Brockway Engineering, P.L.L.C.
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All information, calculations, maps, drawings, or other documents transmitted via e-mail are preliminary unless explicitly stated in the e-mail text or in the documents themselves.

From: Ritter, Ashley [mailto:Ashley.Ritter@idwr.idaho.gov]
Sent: Thursday, March 11, 2021 11:39 AM
To: zach.latham@brockwayeng.com; erick.powell@brockwayeng.com
Subject: RE: 2020 Dry Lot LLC Yearly Report

Good morning,

I did have a question regarding the 2020 yearly report for Dry Lot LLC associated with water right 37-22252. It is reported that in 2020, 347.4 AF (an increase of 73.6 AF over 2019) of water was pumped from the Valley Club HOA wells (East & West wells combined) for domestic and irrigation uses associated with 52 residences. The report noted that the reason for the increase when compared to 2019 is unknown, although there may be reason to believe that the existing in-line meters associated with the two HOA wells may be inaccurate and are reporting erroneously high diversion volumes. My question is are there any future plans for calibration and if necessary replacement of the meters to better ensure correct meter readouts, thus ensuring a more accurate representation of the reported data? Please let me know your thoughts. Thank you.

Ashley M. Ritter, E.I.T., G.I.T. | Associate Engineer
Idaho Department of Water Resources-State Office
(208) 287-4907 | www.idwr.idaho.gov



BROCKWAY
ENGINEERING
P.L.L.C.

Hydraulics

Hydrology

Water Resources

RECEIVED

FEB 10 2021

DEPARTMENT OF
WATER RESOURCES

February 5th, 2021

Mr. Manuel Rauhut
Idaho Department of Water Resources
322 East Front Street
P. O. Box 83720
Boise, Idaho 83720-0098

RE: Annual Report: Aquifer Recharge and Pumping Report for 2020, Dry Lot LLC, License 37-22252

Dear Mr. Rauhut,

Please see the attached yearly report outlining Dry Lot LLC's activities on the aquifer recharge and pumping project for 2020 at the Valley Club HOA recharge site north of Hailey, Idaho. This report is submitted to comply with the reporting conditions required under water right license 37-22252 and Transfer 74449 in the name of Dry Lot LLC. We apologize for the delay in this submittal; a hard copy will follow in the mail.

Please review this report at your convenience. If you have any questions or comments, please do not hesitate to contact me at (208) 736-8543.

Sincerely,

G. Erick Powell, Ph.D., P.E.

CHARLES E.
BROCKWAY,
PH.D., P.E.

CHARLES G.
BROCKWAY,
PH.D., P.E.

Cc: Mr. Woody Friedlander- Dry Lot LLC
Mr. Barry Bevers- The Valley Club Inc.
Mr. Travis Thompson
Big Wood Canal Company
Indian Creek HOA c/o: Mr. Randy Budge
Mr. Kevin Lakey- Water District 37 Watermaster

2016 NORTH
WASHINGTON
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TWIN FALLS,
IDAHO 83301

208•736•8543

FAX: 736•8506

FEB 10 2021

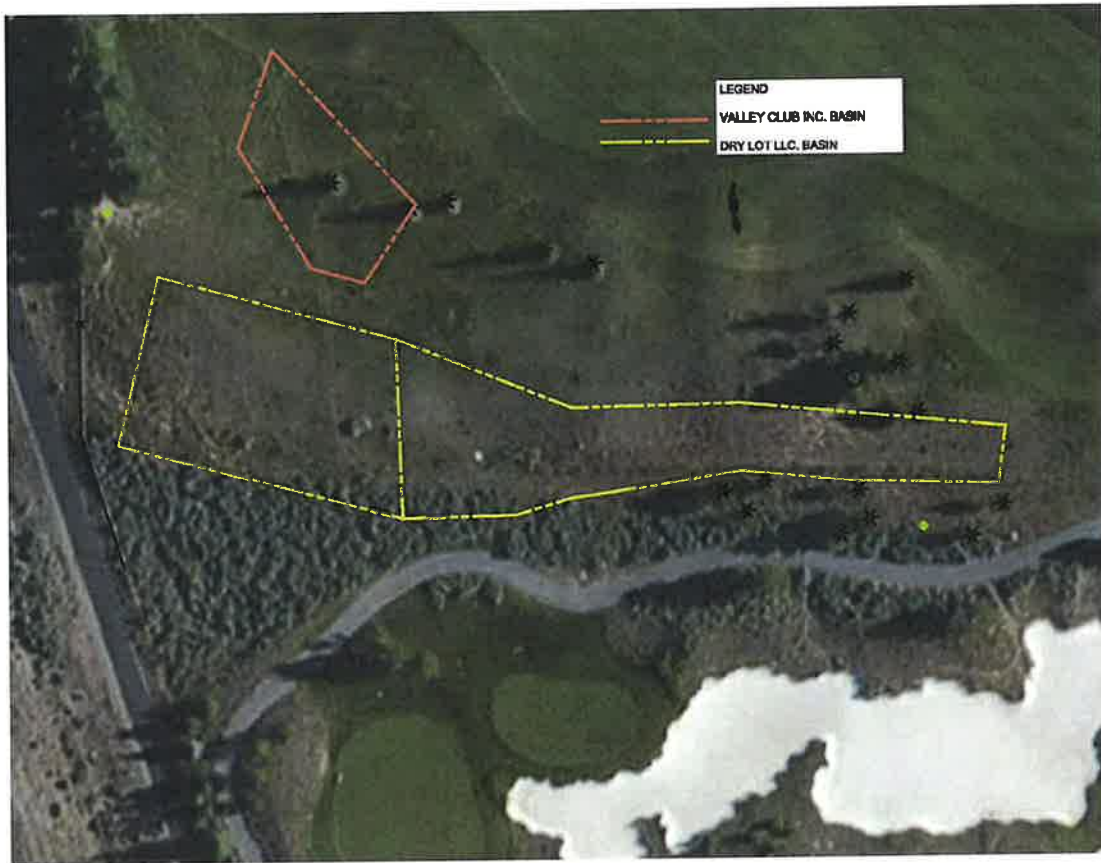
AQUIFER RECHARGE AND PUMPING

DEPARTMENT OF
WATER RESOURCES

DRY LOT LLC

REPORT – 2020

February 2021



**AQUIFER RECHARGE AND PUMPING
DRY LOT LLC
REPORT- 2020
February 2021**

Principal Authors: Zach Latham, M.S. Hydrologist
G. Erick Powell, Ph.D., P.E.

Prepared For: Dry Lot LLC

Prepared By: Brockway Engineering, PLLC
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(208) 736-8543 (Phone)
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OVERVIEW

This report documents activities and performance for the reporting year of 2020 at the Dry Lot LLC aquifer recharge site located at the Valley Club north of Hailey, Idaho (Figure 1). This report is prepared to comply with condition number two of Dry Lot LLC water right license 37-22252 and condition number five of Dry Lot LLC water rights 37-22313, 37-22318, and 37-22323 issued by the Idaho Department of Water Resources (IDWR).

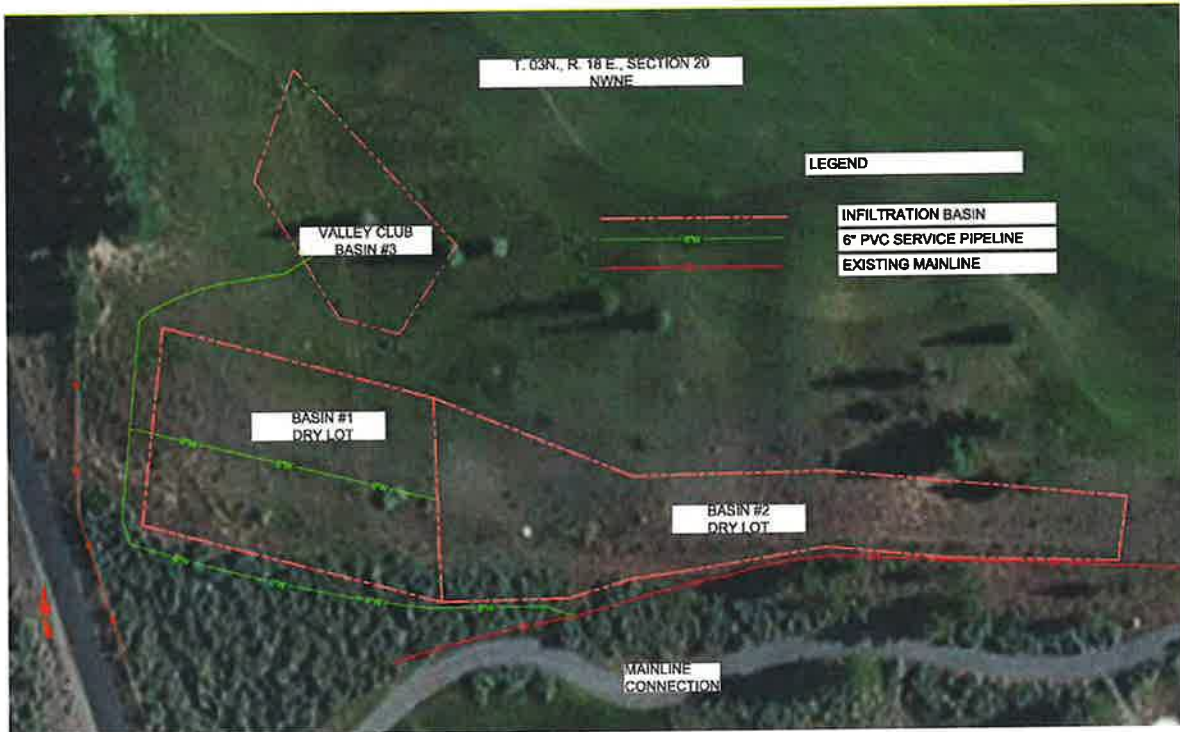


Figure 1: Locations of Dry Lot LLC and Valley Club Infiltration Basins.

Dry Lot LLC water rights 37-22313, 37-22318, and 37-22323 authorize the recharge of up to 75.4 acre-feet of water from the Big Wood River through the adjacent Hiawatha Canal and Valley Club golf course irrigation system. Dry Lot LLC water right 37-22252 authorizes the extraction of irrigation water from the existing Valley Club Home Owners Association's wells in T.03N R.18E SEC.20 SW $\frac{1}{4}$ NE $\frac{1}{4}$ and SE $\frac{1}{4}$ NW $\frac{1}{4}$ for the irrigation of up to 27.5 acres within the place of use.

IDWR Permit No. 37-22252 in the name of Dry Lot LLC was approved on August 8th, 2010 authorizing 27.5 acres of irrigation. Planning and design of the infiltration system was coordinated with The Valley Club Inc. The design of the system was revised to add an additional recharge volume to accommodate a proposed project by The Valley

Club Inc. for enhanced golf course irrigation (see Figure 1). Proof of beneficial use of 37-22252 was filed with IDWR on June 11th 2015 and the water right permit was licensed as permitted on September 1st 2015 for the irrigation of 27.5 acres using 75.4 acre-feet of water.

This report has been drafted on behalf of Dry Lot LLC includes the following information: location of facilities, basin recharge, compliance summary and conclusions.

LOCATION OF FACILITIES

Facilities associated with the Dry Lot LLC and The Valley Club Inc. infiltration basins are located in T.3N R.18E SEC.20 NWSE. Infiltration basin recharge water is diverted from the Valley Club Inc.'s irrigation system, flows through a 6" delivery line into an Orival OR-04-PE 100 micron mesh filter, and can enter either of the two Dry Lot LLC or one Valley Club Inc. infiltration basins. Basin layout was designed and constructed to meet the required area for infiltration, as well as to meet physical constraints such as accommodating for existing irrigation piping and golf course irrigation facilities. An infiltration basin facility overview is shown in Appendix A.

BASIN RECHARGE

Condition of approval #2 on Dry Lot LLC water right license 37-22252 requires submittal of an annual report by January 31, of each year to include the following:

- a) The volume of water diverted from the authorized points of diversion for each month of the prior calendar year,
- b) The number and location (by subdivision lot number) of the acres of land irrigated in connection with this right during the prior calendar year and
- c) The number and location (by subdivision lot number) of the homes served domestic water from the authorized points of diversion pursuant to other water rights during the prior calendar year.

Water right transfer no. 74449 is also conditioned such that the daily volume of water recharged is reported to IDWR. Dry Lot LLC daily infiltration volumes are attached to this report. Table 1 shows the flow meter readings and diversion volumes from the Valley Club Owners Association Inc.'s (HOA) wells during 2020. Table 2 shows the subdivision lots that were irrigated using Dry Lot LLC water right 37-22252 during 2020. Table 3 shows the subdivision lots that were served domestic water from the Valley Club HOA's wells under water rights 37-8613A and 37-8810 during 2020.

2020				
DATE:	<i>East Well in Pump House</i> PUMP #1 METER	<i>East Well in Pump House</i> Total	<i>West Well Across Road</i> PUMP #2 METER	<i>West Well Across Road</i> Total
	TOTALIZER (GAL):	Usage (AFA):	TOTALIZER (GAL):	Usage (AFA):
1/2/2020	358,710,400		433,541,100	
2/1/2020	358,710,700	0.0	435,332,100	5.5
3/5/2020	360,588,700	5.8	435,545,300	6.2
3/31/2020	361,199,500	7.6	437,540,600	12.3
4/9/2020	362,121,400	10.5	437,540,600	12.3
5/2/2020	364,462,800	17.7	440,052,000	20.0
6/4/2020	373,173,700	44.4	448,663,500	46.4
6/5/2020	373,684,400	46.0	448,813,700	46.9
6/6/2020	374,128,500	47.3	449,029,600	47.5
7/1/2020	381,960,600	71.4	456,540,400	70.6
7/31/2020	392,602,700	104.0	466,929,100	102.5
8/31/2020	402,874,600	135.5	476,459,100	131.7
9/29/2020	409,728,000	156.6	483,671,900	153.8
10/31/2020	412,177,700	164.1	486,949,800	163.9
11/3/2020	412,177,700	164.1	486,998,100	164.1
12/1/2020	415,423,800	174.0	489,481,100	171.7
12/8/2020	415,490,900	174.3	489,481,100	171.7
1/1/2021	415,967,900	175.7	489,483,600	171.7
TOTALS PER WELL:		175.7 Acre-Feet		171.7 Acre-Feet
TOTAL FOR BOTH WELLS:		347.4 Acre-Feet		

Table 1: Valley Club Homeowners Wells' Diversion Volumes for 2020.

2020		
Lot # Served Irrigation		
Water Under 37-22252 From		
Valley Club HOA Wells:		
6	54	97
15	56	97E
16	57	99
17	58	
22	61	
34	65	
36	67	
39	68	
43	78	
46	80	
48	85	
49	88	
51	92	
52	95	
53	96	
TOTAL:	33	

Table 2: Lots Receiving Irrigation Water from water right 37-22252 for 2020.

2020			
Lot # Served Domestic Water Under			
37-8613A & 37-8810 Valley Club HOA Wells:			
2	32	50	70
5	34	51	77
6	35	52	78
7	36	53	80
9	37	54	84
10	39	57	85
13	41	58	88
15	42	61	92
16	43	64	95
17	43	65	96
22	46	66	97
26	48	67	98
29	49	68	99
TOTAL:	52		

Table 3: Lots Receiving Domestic Water from Valley Club Owners Association Inc.'s Water Rights 37-8613A and 37-8810 during 2020.

In 2020, 347.4 acre-feet (an increase of 73.6 AF over 2019) of water was pumped from the Valley Club HOA wells for domestic and irrigation uses associated with 52 residences. The reason for the increase in volume pumped when compared with 2019

is unknown, although we have reason to believe that the existing in-line meters associated with the two HOA wells are inaccurate and are reporting erroneously high diversion volumes.

It is important to note that water authorized to be diverted under 37-21337, owned by Village Green at the Valley Club Homeowners Assn. Inc., is also diverted through the two Valley Club HOA wells and the volume diverted in 2020 under this right is included in the 347.4 acre-foot volume reported here. An in-line meter was installed in October of 2019 at the upstream point of delivery for this right, so as to be able to determine the yearly volume pumped and delivered under 37-21337. For 2020, it was assumed that all 33.0 acre feet under 37-21337 were diverted.

The most recent publicly available aerial image is the 2019 NAIP image. An aerial image of the subdivision was flown in 2020 and this photo was used to calculate acres irrigated during 2020 under 37-22252. 0.25 acres of irrigation occurred under 37-22252 on a lot owned by The Valley Club Inc. (Lot 97E) in 2020 (Figure 2); this lot is located directly east of Valley Club HOA Lot 97. Although this parcel is located outside of the current GIS shapefile in the IDWR database, this area can be added as discussed by Dry Lot LLC's legal counsel Travis Thompson and Shelley Keen. See the attached IDWR Memo dated 9/25/2015 that was previously submitted in the 2015 through 2019 annual reports. Brockway Engineering has confirmed that less than 28 acres were irrigated within the NWSW of Section 28 during 2020.

On all lots described in Table 2 with a residence (excludes Lot 56 and 97E), irrigation of 0.22 acres per lot (6.6 acres on 31 lots) is authorized and occurred under 37-8613A during 2020. 1.0 acre of private irrigation is authorized and occurred under water right 37-4F on lot 57. Additionally, 27.5 total acres were irrigated under 37-22252 on the thirty three lots described in Table 2. 35.1 total acres of irrigation occurred on the lots described in Table 2 (including Lots 56 and 97E) under 37-22252, 37-8613A and 37-4F and are shown in Figure 3.

Between April 20th and May 31st 2020, 29.6 acre feet were recharged in Dry Lot LLC basins 1 and 2. Between June 1st and June 30th, 31.9 acre feet were infiltrated and between July 1st and July 17th, 15.8 acre feet were infiltrated in Dry Lot LLC basins 1 and 2 for a total of 77.3 acre feet recharged in 2020. Both basins were turned off on July 17th, 2020.

Approved IDWR transfer no. 74449 is conditioned such that the recharge volume may not exceed 30 acre-feet before June 1st under 37-22313, 37-22318, and 37-22323. During 2020, this condition was met. Additionally, a recharge volume of 75.4 acre-feet is authorized under 37-22252 when all of the 27.5 acres are irrigated under 37-22252. On the thirty three total lots, 27.5 acres was irrigated under 37-22252, requiring 75.4 acre-feet to be recharged. In 2020, an extra $77.3 - 75.4 = 1.9$ acre-feet were recharged

under 37-22313, 37-22318, and 37-22323 and that volume was not diverted under 37-22252.



Figure 2: Irrigation on Lot 97 and 97E under 37-22252 and 37-8613A.



Figure 3: 2020 Irrigated Areas under 37-4F, 37-8613A and 37-22252.

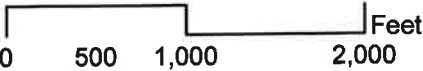
COMPLIANCE SUMMARY

In 2020, fifty-two residences were present within the Valley Club subdivision. 27.5 total acres are authorized to be irrigated under water right 37-22252 and 27.5 acres were irrigated under this water right during 2020. Within the Valley Club subdivision, one half acre per lot are authorized to be irrigated under water right 37-8613A (in conjunction with a domestic use and residence) although only 0.22 acres were irrigated on 31 lots with a residence under this right, and 1.0 acre is authorized under private water right 37-4F appurtenant to Lot 57. 77.3 acre-feet of water was infiltrated into the Dry Lot LLC basins in 2020. Irrigation of 27.5 acres under 37-22252 in 2020 required 75.4 acre-feet to be infiltrated.

CONCLUSIONS

1. Construction on the infiltration basins for the project commenced in early December 2011 and was completed in mid-May 2012.
2. Water right 37-22252 was licensed on September 1st 2015.
3. On the lots described in Table 2 including Lot 97E, 27.5 total acres were irrigated under 37-22252, 6.6 acres under water right 37-8613A and 1.0 acre under 37-4F on private lot 57 during 2020.
4. The total diversion volume associated with the irrigation on thirty three lots (irrigation not associated with a domestic or a private irrigation water right) under 37-22252 was 75.4 acre-feet. In 2020, 29.6 acre-feet were recharged before June 1st and 47.7 acre-feet of water was recharged from that date through July 17th in the two Dry Lot LLC Basins, leaving an excess of 1.9 acre-feet infiltrated.
5. The volume recharged in 2020 was adequate under existing Dry Lot LLC water rights 37-22313, 37-22318, and 37-22323 for the irrigation of 27.5 acres as authorized under 37-22252 and all 27.5 were irrigated.
6. In 2020, the total volume pumped from the two Valley Club HOA wells for domestic and irrigation uses associated with 37-8613A and 37-8810 within the Valley Club Subdivision and under Village Green at the Valley Club HOA water right 37-21337, was 316.4 acre-feet. Usage under 37-21337 was estimated at 33.0 acre feet for 2020.
7. Facilities are designed to accommodate The Valley Club Inc.'s recharge volumes based on the approval of Valley Club Inc. water right transfer application no. 78255.

APPENDIX A: INFILTRATION BASIN FACILITY OVERVIEW



BROCKWAY ENGINEERING, PLLC.
JJJ - Date: 2/5/2021

DRY LOT LLC

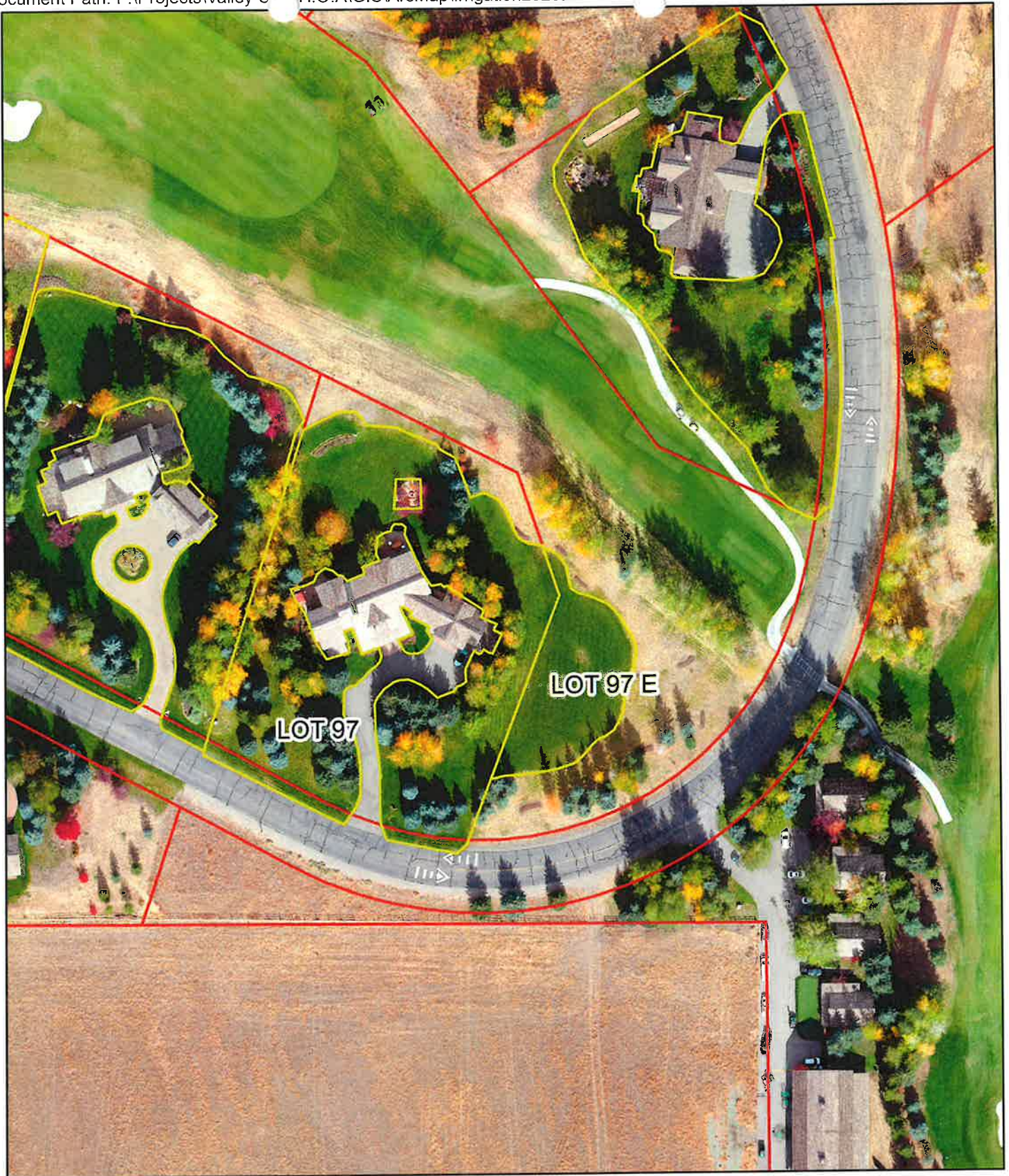
2020 ANNUAL REPORT

2020 AERIAL PHOTO

Legend

- Valley Club Subdivision
- 37-22252, 37-8613A, 37-F Irrigation 35.14 Acres





0 50 100 200 Feet

DRY LOT LLC

2020 ANNUAL REPORT
LOT 97 & 97E

2020 AERIAL PHOTO

BROCKWAY ENGINEERING, PLLC.
JJJ - Date: 2/1/2021

Legend

- 37-22252, 37-6613A, 37-F Irrigation
- Valley Club Subdivision



DRY LOT LLC- DAILY RECHARGE VOLUMES

2020 Daily Recharge Volumes Associated with IDWR WR Transfer:

74449, Condition #1.

*Values in **bold** indicate observed values.

2/5/2021

Date:	Time:	*Meter Readout (m3):	*Meter Readout (Acre-Feet):	Calculated Daily Volume Infiltrated (Acre-Feet):
1-Apr		Off.		
2-Apr		Off.		
3-Apr		Off.		
4-Apr		Off.	565.6	0.00
5-Apr		Off.	565.6	0.00
6-Apr		Off.	565.6	0.00
7-Apr		Off.	565.6	0.00
8-Apr		Off.	565.6	0.00
9-Apr		Off.	565.6	0.00
10-Apr		Off.	565.6	0.00
11-Apr		Off.	565.6	0.00
12-Apr		Off.	565.6	0.00
13-Apr		Off.	565.6	0.00
14-Apr		Off.	565.6	0.00
15-Apr		Off.	565.6	0.00
16-Apr		Off.	565.6	0.00
17-Apr		Off.	565.6	0.00
18-Apr		Off.	565.6	0.00
19-Apr		Off.	565.6	0.00
20-Apr	12:00 PM	697,601.9	565.6	0.00
21-Apr		698,879.9	566.6	1.04
22-Apr		700,158.0	567.6	1.04
23-Apr		701,436.0	568.7	1.04
24-Apr		702,714.1	569.7	1.04
25-Apr		703,992.1	570.7	1.04
26-Apr		705,270.2	571.8	1.04
27-Apr		706,548.2	572.8	1.04
28-Apr		707,826.3	573.8	1.04
29-Apr		709,104.3	574.9	1.04
30-Apr		709,562.6	575.3	0.37
APRIL TOTAL:		11,960.7	9.7 AFA	

Date:	Time:	*Meter Readout (m3):	*Meter Readout (Acre-Feet):	Calculated Daily Volume Infiltrated (Acre-Feet):
1-May		710,020.9	575.6	0.37
2-May		710,479.1	576.0	0.37
3-May		710,937.4	576.4	0.37
4-May	11:23 AM	710,933.4	576.4	0.00
5-May		712,023.0	577.2	0.88
6-May		713,112.6	578.1	0.88
7-May		714,202.2	579.0	0.88
8-May		715,291.7	579.9	0.88
9-May		716,381.3	580.8	0.88
10-May		717,470.9	581.7	0.88
11-May	9:23 AM	718,560.5	582.5	0.88
12-May		719,972.3	583.7	1.14
13-May		721,384.1	584.8	1.14
14-May		722,795.8	586.0	1.14
15-May	11:13 AM	724,207.6	587.1	1.14
16-May		725,566.0	588.2	1.10
17-May		726,924.5	589.3	1.10
18-May	9:58 AM	728,282.9	590.4	1.10
19-May	10:00 AM	729,671.1	591.6	1.13
20-May		731,165.7	592.8	1.21
21-May		732,660.3	594.0	1.21
22-May	1:40 PM	734,154.9	595.2	1.21
23-May		Off.	595.2	0.00
24-May		Off.	595.2	0.00
25-May		Off.	595.2	0.00
26-May		Off.	595.2	0.00
27-May		Off.	595.2	0.00
28-May		Off.	595.2	0.00
29-May		Off.	595.2	0.00
30-May		Off.	595.2	0.00
31-May		Off.	595.2	0.00
MAY TOTAL:		24,592.3	19.9 AFA	
*PRE-JUNE TOTALS:		36,553.0	29.6 AFA	

Date:	Time:	*Meter Readout (m3):	*Meter Readout (Acre-Feet):	Calculated Daily Volume Infiltrated (Acre-Feet):
1-Jun	2:19 PM	734,154.9	595.2	0.00
2-Jun		735,545.0	596.3	1.13
3-Jun		736,935.1	597.4	1.13
4-Jun		738,325.2	598.6	1.13
5-Jun		739,715.3	599.7	1.13
6-Jun		741,105.5	600.8	1.13
7-Jun		742,495.6	602.0	1.13
8-Jun		743,885.7	603.1	1.13
9-Jun		745,275.8	604.2	1.13
10-Jun	4:53 PM	746,665.9	605.3	1.13
11-Jun		747,976.5	606.4	1.06
12-Jun		749,287.2	607.5	1.06
13-Jun		750,597.8	608.5	1.06
14-Jun		751,908.5	609.6	1.06
15-Jun		753,219.1	610.6	1.06
16-Jun		754,529.7	611.7	1.06
17-Jun		755,840.4	612.8	1.06
18-Jun	9:50 AM	757,151.0	613.8	1.06
19-Jun		758,515.3	614.9	1.11
20-Jun		759,879.6	616.0	1.11
21-Jun		761,243.9	617.2	1.11
22-Jun		762,608.3	618.3	1.11
23-Jun		763,972.6	619.4	1.11
24-Jun		765,336.9	620.5	1.11
25-Jun		766,701.2	621.6	1.11
26-Jun	10:42 AM	768,065.5	622.7	1.11
27-Jun		769,431.2	623.8	1.11
28-Jun		770,797.0	624.9	1.11
29-Jun		772,162.7	626.0	1.11
30-Jun		773,528.4	627.1	1.11
*JUNE TOTALS:		39,373.5	31.9 AFA	

Date:	Time:	*Meter Readout (m3):	*Meter Readout (Acre-Feet):	Calculated Daily Volume Infiltrated (Acre-Feet):
1-Jul		774,894.2	628.2	1.11
2-Jul	11:03 AM	776,259.9	629.3	1.11
3-Jul		777,653.2	630.5	1.13
4-Jul		779,046.4	631.6	1.13
5-Jul		780,439.7	632.7	1.13
6-Jul		781,832.9	633.8	1.13
7-Jul	2:00 PM	783,226.2	635.0	1.13
8-Jul		784,199.5	635.8	0.79
9-Jul		785,172.8	636.5	0.79
10-Jul		786,146.0	637.3	0.79
11-Jul		787,119.3	638.1	0.79
12-Jul		788,092.6	638.9	0.79
13-Jul		789,065.9	639.7	0.79
14-Jul		790,039.2	640.5	0.79
15-Jul		791,012.4	641.3	0.79
16-Jul		791,985.7	642.1	0.79
17-Jul	10:15 AM	792,959.0	642.9	0.79
18-Jul		Off.	642.9	0.00
19-Jul		Off.	642.9	0.00
20-Jul		Off.	642.9	0.00
21-Jul		Off.	642.9	0.00
22-Jul		Off.	642.9	0.00
23-Jul		Off.	642.9	0.00
24-Jul		Off.	642.9	0.00
25-Jul		Off.	642.9	0.00
26-Jul		Off.	642.9	0.00
27-Jul		Off.	642.9	0.00
28-Jul		Off.	642.9	0.00
29-Jul		Off.	642.9	0.00
30-Jul		Off.	642.9	0.00
31-Jul		Off.	642.9	0.00
*JULY TOTALS:		19,430.6	15.8 AFA	
*SEASON TOTALS:		95,357.1	77.3 AFA	

MEMORANDUM

DATE: September 25, 2015

TO: Water Right File 37-22252

FROM: Shelley W. Keen (SWK)

RE: Place of Use

This morning Travis Thompson, attorney for Dry Lot LLC, called to discuss the place of use description for Water Right 37-22252. The place of use includes 28 acres within the NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 28, Township 3 North, Range 18 East. The map attached to the license outlines the 28-acre area. Outside the area outlined on the map is a small, triangle-shaped parcel Dry Lot LLC may acquire from The Valley Club Inc. Travis wanted to know if the triangle-shaped parcel could be irrigated under Right 37-22252 as long as no more than 28 acres within the NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 28 is irrigated.

We reviewed Transfer Processing Memorandum No. 24, which states on page 6:

An application for transfer is not required if a change in the location of use within 40-acre legal subdivisions is proposed that would not result in an increase in the number of acres within any 40-acre legal subdivision nor use of water at a new 40-acre legal subdivision (except for a proposed change in location outside of prescribed boundaries such as those provided for irrigation use under Section 42-219, *Idaho Code* or by court decree, even when the change in location would be included within the same 40-acre legal subdivisions existing prior to the proposed change).

An application for transfer is not required for the situation described in the preceding paragraph, even when the place of use is described by a shapefile in the department's GIS database. The department will not initiate an enforcement action against the water right owner due to a discrepancy between the department's shape file and the physical location of use within the 40-acre legal subdivisions if the discrepancy is limited to the situation described in the preceding paragraph. The department *may* update the shapefile in its GIS database from its own information or information provided by the water right owner.

Based on the guidance quoted above, I told Travis that a transfer would not be required to bring the triangle-shaped parcel into the place of use, as long as no more than 28 acres are irrigated within the NW $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 28. I recommended that Dry Lot LLC notify IDWR when the change occurs by describing it in the annual report required in condition no. 2 of the license. When the change is reported, IDWR may adjust the place of use boundaries in its GIS records.