

## MEMORANDUM

**Date:** January 7, 2019  
**To:** Transfer 82875  
**From:** Brian Normandeau  
**Re:** Review & Evaluation of Sufficiency of Information

This transfer proposes to add a point of diversion to water right 33-2049.

### Authority to File:

The application was signed by Keith Nickerson. Water right 33-2049 is currently in the ownership of Keith or Fern Nickerson per IDWR records, and the land is in the ownership of Keith Nickerson per Butte County parcel information. The new point of diversion proposed by this transfer is on land owned by Nickerson Farms, LLP. Keith Nickerson is registered with the Secretary of the State as the agent for Nickerson Farms, LLP. To accomplish the changes proposed in this transfer a mainline conduit will have to cross properties not owned by the applicant. The applicant included written agreements providing access to these properties.

### Water Right Validity:

The water right involved was decreed in 2000. Aerial imagery shows consistent irrigation of the property since that time. No issues identified.

### Injury to Other Water Rights:

The proposed additional point of diversion is an established groundwater well within an ESPA Model Cell adjacent to the current two points of diversion. It is not near other existing production wells. No issues of injury identified.

### Enlargement of Use:

This transfer does not propose a change in diversion rate or total volume of the water right. The number of irrigated acres remains the same. No issues of enlargement identified.

### Local Public interest:

No issues identified.

### Beneficial Use/Conservation of Water Resources:

No issues identified.

Review of the application finds there is no clear inconsistency with criteria set forth in Section 42-222 Idaho Code preventing processing of this application.