

# AQUIFER RECHARGE AND PUMPING DRY LOT LLC REPORT – 2017 JANUARY 2018



**AQUIFER RECHARGE AND PUMPING  
DRY LOT LLC  
REPORT- 2017  
JANUARY 2018**

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## OVERVIEW

This report documents activities and performance for the reporting year of 2017 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).

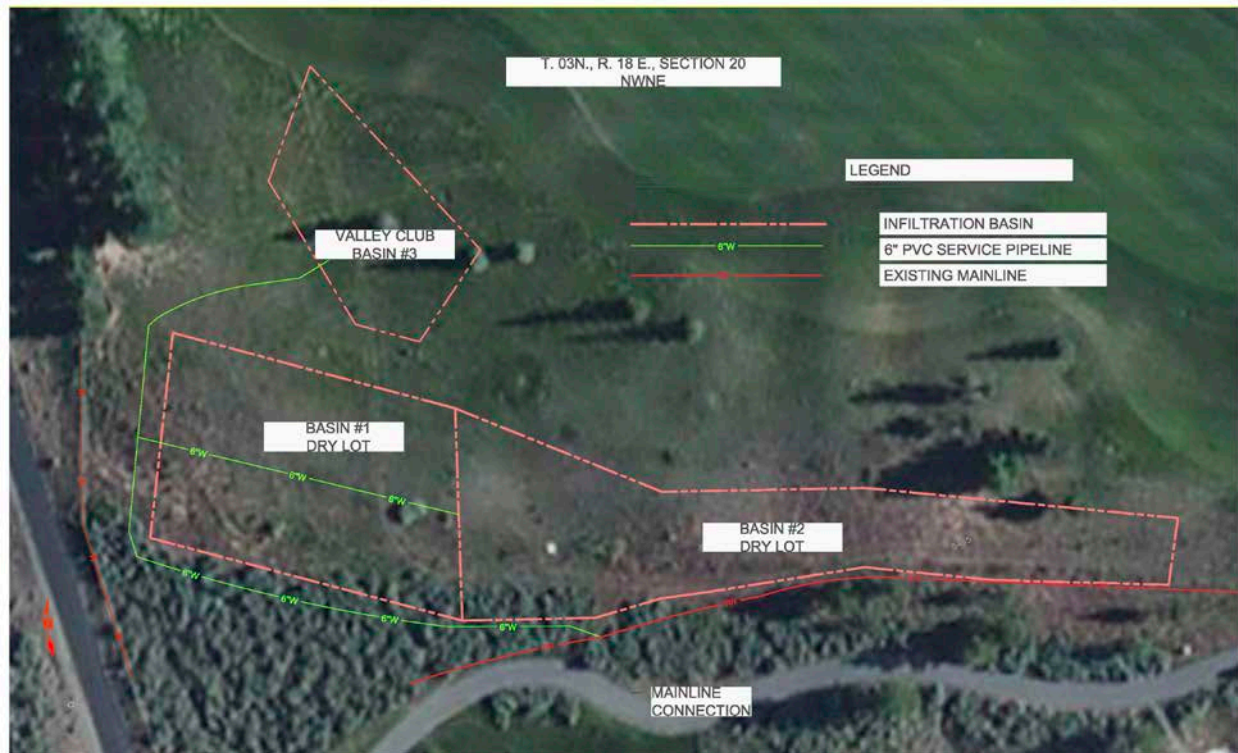


Figure 1: Locations of Dry Lot LLC and Valley Club Infiltration Basins.

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 anywhere within ninety-nine currently platted subdivision lots.

IDWR Permit No. 37-22252 in the name of Dry Lot LLC was approved on August 8<sup>th</sup>, 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 11<sup>th</sup> 2015 and the water right permit was licensed as permitted on September 1<sup>st</sup> 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 2017. Table 2 shows the subdivision lots that were irrigated using Dry Lot LLC water right 37-22252 during 2017. 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 2017.

| <b>2017</b>                  |                         |                        |                         |                        |
|------------------------------|-------------------------|------------------------|-------------------------|------------------------|
|                              | <i>East Well</i>        | <i>East Well</i>       | <i>West Well</i>        | <i>West Well</i>       |
|                              | <i>in Pump House</i>    | <i>in Pump House</i>   | <i>Across Road</i>      | <i>Across Road</i>     |
|                              | <b>PUMP #1 METER</b>    | <b>Total</b>           | <b>PUMP #2 METER</b>    | <b>Total</b>           |
| <b>DATE:</b>                 | <b>TOTALIZER (GAL):</b> | <b>Usage (AFA):</b>    | <b>TOTALIZER (GAL):</b> | <b>Usage (AFA):</b>    |
| 1/1/2017                     | 245,184,900             |                        | 294,446,400             |                        |
| 1/26/2017                    | 245,367,900             | 0.6                    | 294,628,900             | 0.6                    |
| 3/29/2017                    | 245,817,400             | 1.9                    | 295,066,800             | 1.9                    |
| 4/17/2017                    | 245,900,600             | 2.2                    | 295,221,600             | 2.4                    |
| 4/27/2017                    | 246,032,600             | 2.6                    | 295,285,300             | 2.6                    |
| 5/15/2017                    | 247,847,300             | 8.2                    | 296,586,900             | 6.6                    |
| 6/26/2017                    | 255,950,000             | 33.0                   | 305,038,800             | 32.5                   |
| 8/7/2017                     | 266,917,300             | 66.7                   | 319,620,100             | 77.3                   |
| 9/6/2017                     | 273,937,400             | 88.2                   | 330,181,600             | 109.7                  |
| 11/2/2017                    | 278,590,700             | 102.5                  | 336,203,300             | 128.1                  |
| 12/14/2017                   | 278,887,000             | 103.4                  | 336,560,400             | 129.2                  |
| 1/2/2018                     | 279,097,400             | 104.1                  | 336,765,600             | 129.9                  |
| <b>TOTALS PER WELL:</b>      |                         | <b>104.1 Acre-Feet</b> |                         | <b>129.9 Acre-Feet</b> |
| <b>TOTAL FOR BOTH WELLS:</b> |                         | <b>233.9 Acre-Feet</b> |                         |                        |

Table 1: Valley Club Homeowners Wells' Diversion Volumes for 2017.

| <b>2017</b>                      |           |
|----------------------------------|-----------|
| <b>Lot # Served Irrigation</b>   |           |
| <b>Water Under 37-22252 From</b> |           |
| <b>Valley Club HOA Wells:</b>    |           |
| 6                                | 56        |
| 10                               | 57        |
| 15                               | 58        |
| 16                               | 61        |
| 22                               | 65        |
| 29                               | 67        |
| 34                               | 68        |
| 36                               | 78        |
| 43                               | 83        |
| 46                               | 85        |
| 48                               | 88        |
| 49                               | 92        |
| 51                               | 95        |
| 52                               | 96        |
| 53                               | 97        |
| 54                               | 99        |
| <b>TOTAL:</b>                    | <b>32</b> |

Table 2: Lots Receiving Irrigation Water from Dry Lot LLC water right 37-22252.

| 2017                                                                           |    |           |    |
|--------------------------------------------------------------------------------|----|-----------|----|
| Lot # Served Domestic Water Under<br>37-8613A & 37-8810 Valley Club HOA Wells: |    |           |    |
| 5                                                                              | 34 | 53        | 80 |
| 6                                                                              | 35 | 54        | 83 |
| 7                                                                              | 36 | 57        | 85 |
| 9                                                                              | 37 | 58        | 88 |
| 10                                                                             | 41 | 61        | 92 |
| 13                                                                             | 43 | 64        | 95 |
| 15                                                                             | 44 | 65        | 96 |
| 16                                                                             | 46 | 66        | 97 |
| 17                                                                             | 48 | 67        | 98 |
| 22                                                                             | 49 | 68        | 99 |
| 26                                                                             | 50 | 70        |    |
| 29                                                                             | 51 | 77        |    |
| 32                                                                             | 52 | 78        |    |
| <b>TOTAL:</b>                                                                  |    | <b>49</b> |    |

Table 3: Lots Receiving Domestic Water from Valley Club Owners Association Inc. water rights 37-8613A and 37-8810.

In 2017, 233.9 acre-feet (a decrease of 50.6 AF over 2016) of water was pumped from the Valley Club HOA wells for domestic use in 49 residences and irrigation uses associated with 48 residences. The decrease in volume pumped when compared with 2016 is likely attributable to cessation of leaks in the Valley Club HOA distribution system as a result of maintenance on the system. 0.64 acres of irrigation occurred under 37-22252 on a lot owned by The Valley Club Inc. (Lot 97E) in 2017 (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 and 2016 annual reports. Brockway Engineering has confirmed that less than 28 acres were irrigated within the NWSW of Section 28 during 2017.

On all lots described in Table 2 (except for Lot 56), irrigation of ½ acre per lot (15.5 acres on 31 lots) is authorized and occurred under 37-8613A during 2017. 1.0 acre of private irrigation is authorized and occurred under water right 37-4F on lot 57. Additionally, 18.7 total acres were irrigated under 37-22252 on the thirty two lots described in Table 2 and on Lot 97E. 35.2 total acres of irrigation occurred on the lots described in Table 2 and are shown in Figure 3.

Between April 27<sup>th</sup> and May 25<sup>th</sup> 2017, 29.2 acre feet were recharged in Dry Lot LLC basins 1 and 2. Both basins remained off from May 26<sup>th</sup> through June 29<sup>th</sup> due to high sediment loads and Hiawatha Canal maintenance associated with elevated spring runoff discharges in the Big Wood River. On June 30<sup>th</sup>, 0.2 acre feet were infiltrated.

Between July 1<sup>st</sup> and July 31<sup>st</sup>, 32.7 acre feet were infiltrated. Finally, between August 1<sup>st</sup> and August 14<sup>th</sup> 2017, 14.6 acre feet were recharged in Dry Lot LLC basins 1 and 2 for a total of 76.5 acre feet recharged in 2017. Approved IDWR transfer no. 74449 is conditioned such that the recharge volume may not exceed 30 acre-feet before June 1<sup>st</sup> under 37-22313, 37-22318, and 37-22323. During 2017, 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 two total lots, 18.7 acres was irrigated under 37-22252, requiring 51.4 acre-feet to be recharged. In 2017, an extra  $76.5 - 51.4 = 25.1$  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.

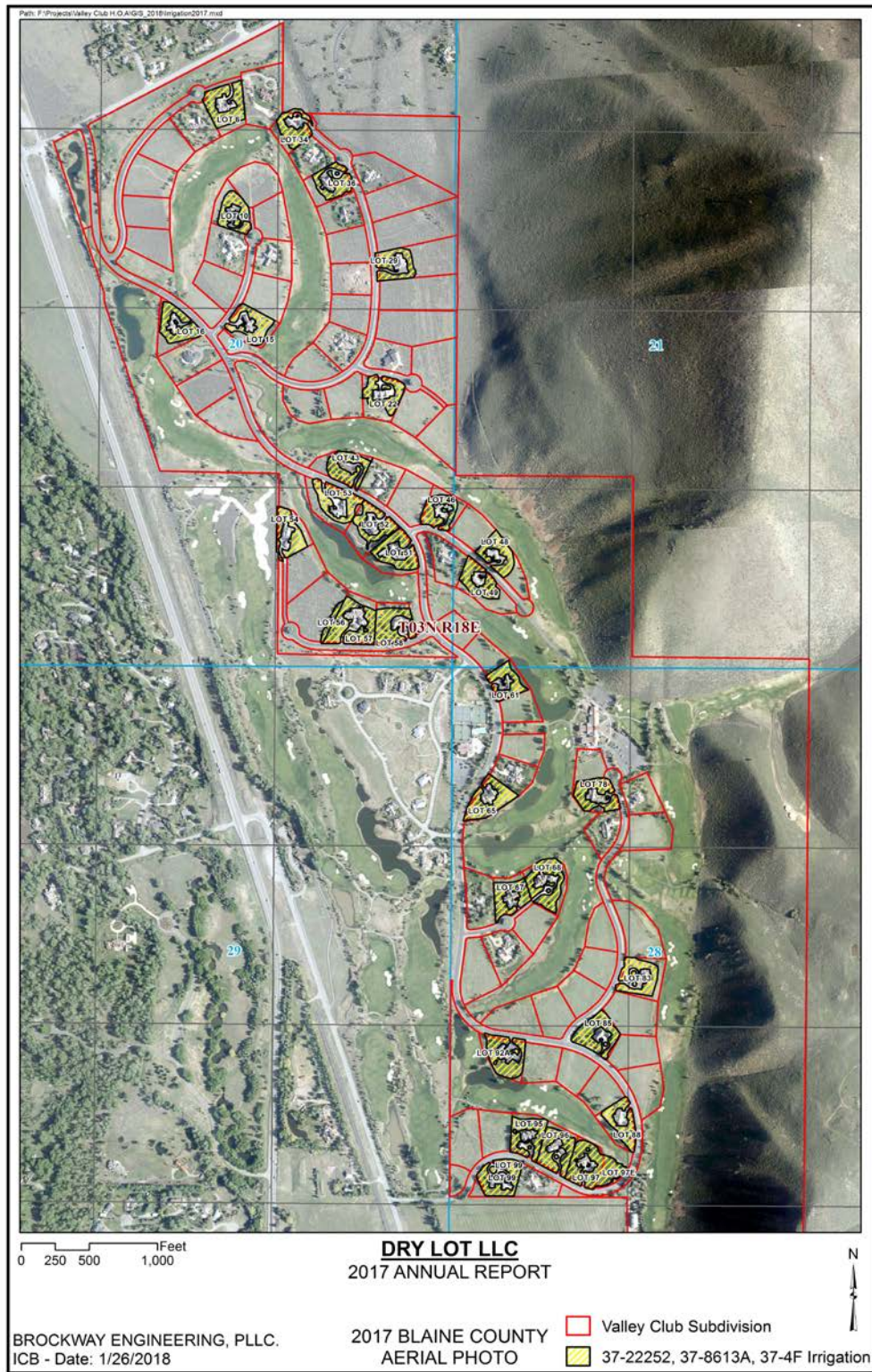


Figure 3: 2017 Irrigated Areas under 37-4F, 37-8613A and 37-22252.

## COMPLIANCE SUMMARY

In 2017, forty-nine residences were present within the Valley Club subdivision. 27.5 total acres are authorized to be irrigated under water right 37-22252 although only 18.7 acres were irrigated under this water right in 2017. Within the Valley Club subdivision, one half acre per lot are authorized under water right 37-8613A (in conjunction with a domestic use and residence), and 1.0 acre is authorized under private water right 37-4F appurtenant to Lot 57. 76.5 acre-feet of water was infiltrated into the Dry Lot LLC basins in 2017. Irrigation of 18.7 acres under 37-22252 in 2017 required 51.4 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 1<sup>st</sup> 2015.
3. On the lots described in Table 2 including Lot 97E, 18.7 total acres were irrigated under 37-22252, 15.5 acres under water right 37-8613A and 1.0 acre under 37-4F on private lot 57 during 2017.
4. The total diversion volume associated with the irrigation on thirty two lots (irrigation not associated with a domestic or a private irrigation water right) under 37-22252 was 51.4 acre-feet. In 2017, 29.2 acre-feet were recharged before June 1<sup>st</sup> and 47.3 acre-feet of water was recharged through August 14<sup>th</sup> in the two Dry Lot LLC Basins, leaving an excess of 25.1 acre-feet infiltrated.
5. The volume recharged in 2017 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 although only 18.7 were irrigated.
6. In 2017, the total volume pumped from the Valley Club HOA wells for domestic and irrigation uses was 233.9 acre-feet.
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





 Valley Club Subdivision

 37-22252, 37-8613A, 37-4F Irrigation



**DRY LOT LLC**

**LOT 97 & 97E IRRIGATION**

BROCKWAY ENGINEERING, PLLC.  
ICB - Date: 1/26/2018

2017 BLAINE COUNTY  
AERIAL PHOTO

 Valley Club Subdivision  
 37-22252, 37-8613A Irrigation

## DRY LOT LLC- DAILY RECHARGE VOLUMES

2017 Daily Recharge Volumes Associated with IDWR WR Transfer:

74449, Condition #1.

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

1/3/2018

| Date:             | Time:             | *Meter<br>Readout (m3): | *Meter Readout<br>(Acre-Feet): | Calculated Daily Volume<br>Infiltrated (Acre-Feet): |
|-------------------|-------------------|-------------------------|--------------------------------|-----------------------------------------------------|
| 27-Apr            | 2:20 PM           | <b>410,067.5</b>        | 332.4                          | 0.0                                                 |
| 28-Apr            | 2:07 PM           | <b>411,690.5</b>        | 333.8                          | 1.3                                                 |
| 29-Apr            |                   | 412,687.0               | 334.6                          | 0.8                                                 |
| 30-Apr            |                   | 413,683.5               | 335.4                          | 0.8                                                 |
| 1-May             |                   | 414,679.9               | 336.2                          | 0.8                                                 |
| 2-May             |                   | 415,676.4               | 337.0                          | 0.8                                                 |
| 3-May             | 2:07 PM           | <b>416,672.9</b>        | 337.8                          | 0.8                                                 |
| 4-May             |                   | 416,672.9               | 337.8                          | 0.0                                                 |
| 5-May             | 3:54 PM           | <b>416,832.6</b>        | 337.9                          | 0.1                                                 |
| 6-May             |                   | 418,201.3               | 339.0                          | 1.1                                                 |
| 7-May             |                   | 419,570.0               | 340.2                          | 1.1                                                 |
| 8-May             |                   | 420,938.7               | 341.3                          | 1.1                                                 |
| 9-May             |                   | 422,307.4               | 342.4                          | 1.1                                                 |
| 10-May            | 12:29 PM          | <b>423,676.1</b>        | 343.5                          | 1.1                                                 |
| 11-May            |                   | 425,145.5               | 344.7                          | 1.2                                                 |
| 12-May            |                   | 426,614.8               | 345.9                          | 1.2                                                 |
| 13-May            |                   | 428,084.2               | 347.1                          | 1.2                                                 |
| 14-May            |                   | 429,553.5               | 348.2                          | 1.2                                                 |
| 15-May            |                   | 431,022.9               | 349.4                          | 1.2                                                 |
| 16-May            |                   | 432,492.2               | 350.6                          | 1.2                                                 |
| 17-May            | 2:48 PM           | <b>433,961.6</b>        | 351.8                          | 1.2                                                 |
| 18-May            |                   | 435,494.5               | 353.1                          | 1.2                                                 |
| 19-May            |                   | 437,027.4               | 354.3                          | 1.2                                                 |
| 20-May            |                   | 438,560.3               | 355.5                          | 1.2                                                 |
| 21-May            |                   | 440,093.3               | 356.8                          | 1.2                                                 |
| 22-May            |                   | 441,626.2               | 358.0                          | 1.2                                                 |
| 23-May            |                   | 443,159.1               | 359.3                          | 1.2                                                 |
| 24-May            | 12:08 PM          | <b>444,692.0</b>        | 360.5                          | 1.2                                                 |
| 25-May            | 4:15 PM           | <b>446,044.9</b>        | 361.6                          | 1.1                                                 |
| 26-May            | Basin Turned Off. |                         | 361.6                          | 0.0                                                 |
| 27-May            |                   | Off.                    | 361.6                          | 0.0                                                 |
| 28-May            |                   | Off.                    | 361.6                          | 0.0                                                 |
| 29-May            |                   | Off.                    | 361.6                          | 0.0                                                 |
| 30-May            |                   | Off.                    | 361.6                          | 0.0                                                 |
| 31-May            |                   | Off.                    | 361.6                          | 0.0                                                 |
| *PRE-JUNE TOTALS: |                   | 35,977.4                | 29.2 AFA                       |                                                     |

| Date:         | Time:   | *Meter<br>Readout (m3): | *Meter Readout<br>(Acre-Feet): | Calculated Daily Volume<br>Infiltrated (Acre-Feet): |
|---------------|---------|-------------------------|--------------------------------|-----------------------------------------------------|
| 1-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 2-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 3-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 4-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 5-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 6-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 7-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 8-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 9-Jun         |         | Off.                    | 361.6                          | 0.0                                                 |
| 10-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 11-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 12-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 13-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 14-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 15-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 16-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 17-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 18-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 19-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 20-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 21-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 22-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 23-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 24-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 25-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 26-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 27-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 28-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 29-Jun        |         | Off.                    | 361.6                          | 0.0                                                 |
| 30-Jun        | 3:27 PM | <b>446,064.7</b>        | 361.6                          | 0.0                                                 |
| *JUNE TOTALS: |         | 19.8                    | 0.02 AFA                       |                                                     |

| Date:         | Time:    | *Meter<br>Readout (m3): | *Meter Readout<br>(Acre-Feet): | Calculated Daily Volume<br>Infiltrated (Acre-Feet): |
|---------------|----------|-------------------------|--------------------------------|-----------------------------------------------------|
| 1-Jul         |          | 447,351.7               | 362.7                          | 1.0                                                 |
| 2-Jul         |          | 448,638.7               | 363.7                          | 1.0                                                 |
| 3-Jul         |          | 449,925.7               | 364.8                          | 1.0                                                 |
| 4-Jul         |          | 451,212.7               | 365.8                          | 1.0                                                 |
| 5-Jul         |          | 452,499.7               | 366.8                          | 1.0                                                 |
| 6-Jul         | 11:49 AM | <b>453,786.7</b>        | 367.9                          | 1.0                                                 |
| 7-Jul         |          | 455,118.4               | 369.0                          | 1.1                                                 |
| 8-Jul         |          | 456,450.2               | 370.1                          | 1.1                                                 |
| 9-Jul         |          | 457,781.9               | 371.1                          | 1.1                                                 |
| 10-Jul        |          | 459,113.7               | 372.2                          | 1.1                                                 |
| 11-Jul        |          | 460,445.4               | 373.3                          | 1.1                                                 |
| 12-Jul        |          | 461,777.2               | 374.4                          | 1.1                                                 |
| 13-Jul        | 2:05 PM  | <b>463,108.9</b>        | 375.4                          | 1.1                                                 |
| 14-Jul        |          | 464,408.4               | 376.5                          | 1.1                                                 |
| 15-Jul        |          | 465,707.9               | 377.6                          | 1.1                                                 |
| 16-Jul        |          | 467,007.4               | 378.6                          | 1.1                                                 |
| 17-Jul        |          | 468,306.9               | 379.7                          | 1.1                                                 |
| 18-Jul        |          | 469,606.4               | 380.7                          | 1.1                                                 |
| 19-Jul        |          | 470,905.9               | 381.8                          | 1.1                                                 |
| 20-Jul        |          | 472,205.4               | 382.8                          | 1.1                                                 |
| 21-Jul        | 11:57 AM | <b>473,504.9</b>        | 383.9                          | 1.1                                                 |
| 22-Jul        |          | 474,793.3               | 384.9                          | 1.0                                                 |
| 23-Jul        |          | 476,081.6               | 386.0                          | 1.0                                                 |
| 24-Jul        |          | 477,370.0               | 387.0                          | 1.0                                                 |
| 25-Jul        |          | 478,658.4               | 388.1                          | 1.0                                                 |
| 26-Jul        |          | 479,946.8               | 389.1                          | 1.0                                                 |
| 27-Jul        |          | 481,235.1               | 390.1                          | 1.0                                                 |
| 28-Jul        |          | 482,523.5               | 391.2                          | 1.0                                                 |
| 29-Jul        |          | 483,811.9               | 392.2                          | 1.0                                                 |
| 30-Jul        |          | 485,100.2               | 393.3                          | 1.0                                                 |
| 31-Jul        |          | 486,388.6               | 394.3                          | 1.0                                                 |
| *JULY TOTALS: |          | 40,323.9                | 32.7 AFA                       |                                                     |

| Date:                 | Time:             | *Meter<br>Readout (m3): | *Meter Readout<br>(Acre-Feet): | Calculated Daily Volume<br>Infiltrated (Acre-Feet): |
|-----------------------|-------------------|-------------------------|--------------------------------|-----------------------------------------------------|
| 1-Aug                 |                   | 487,677.0               | 395.4                          | 1.0                                                 |
| 2-Aug                 |                   | 488,965.4               | 396.4                          | 1.0                                                 |
| 3-Aug                 |                   | 490,253.7               | 397.5                          | 1.0                                                 |
| 4-Aug                 |                   | 491,542.1               | 398.5                          | 1.0                                                 |
| 5-Aug                 |                   | 492,830.5               | 399.5                          | 1.0                                                 |
| 6-Aug                 |                   | 494,118.8               | 400.6                          | 1.0                                                 |
| 7-Aug                 |                   | 495,407.2               | 401.6                          | 1.0                                                 |
| 8-Aug                 |                   | 496,695.6               | 402.7                          | 1.0                                                 |
| 9-Aug                 |                   | 497,983.9               | 403.7                          | 1.0                                                 |
| 10-Aug                |                   | 499,272.3               | 404.8                          | 1.0                                                 |
| 11-Aug                |                   | 500,560.7               | 405.8                          | 1.0                                                 |
| 12-Aug                |                   | 501,849.1               | 406.9                          | 1.0                                                 |
| 13-Aug                |                   | 503,137.4               | 407.9                          | 1.0                                                 |
| 14-Aug                | 10:20 AM          | <b>504,425.8</b>        | 408.9                          | 1.0                                                 |
| 15-Aug                | Basin Turned Off. |                         | 408.9                          | 0.0                                                 |
| 16-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 17-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 18-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 19-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 20-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 21-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 22-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 23-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 24-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 25-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 26-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 27-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 28-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 29-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 30-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| 31-Aug                | Off.              |                         | 408.9                          | 0.0                                                 |
| *AUGUST TOTALS:       |                   | 18,037.2                | 14.6 AFA                       |                                                     |
| <b>SEASON TOTALS:</b> |                   | <b>94,358.3</b>         | <b>76.5 AFA</b>                |                                                     |

## MEMORANDUM

**DATE:** September 25, 2015

**TO:** Water Right File 37-22252

**FROM:** Shelley W. Keen SWK

**RE:** Place of Use

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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.