



SPF WATER
ENGINEERING

November 14, 2017

Shelley Keen, Water Rights Section Manager
Idaho Department of Water Resources
322 E. Front St.
PO Box 83720
Boise, ID 83705

RECEIVED

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DEPARTMENT OF
WATER RESOURCES

Subject: Petition for Reconsideration - Permit 63-33245

Dear Shelley,

On behalf of the Union Block Associates, LLC, please consider this letter as a petition for reconsideration for water right permit 63-33245. The permit was issued a Preliminary Order on October 31, 2017. We wish the Department to reconsider the volume amounts listed on the draft license for reasons specified below.

Based on normal operation, IDWR's licensing review memo estimated a potential diversion volume for the system of 223.6 af. This volume is based on 275 days of continuous pumping from March 1 to November 30 at the 0.41 cfs diversion rate. Given that 125 af has already been authorized under license 63-12342, the additional volume available for licensing under 63-33245 would be 98.6 af. The permit holder acknowledges that the 223.6 af volume is substantially more than the volume necessary to accomplish heating and cooling during that period with more efficient operation of the system. The permit, however, did not include any efficiency requirement. The pumps are operated continuously at constant speed, and the entire diverted volume is run through the heat exchanger to supply heating or cooling. As a result, this petition requests the volume authorized for diversion under rights 63-12342 and 63-33245, in combination, be limited to 223.6 af.

For 63-33245, the volume for heating should be a minimum of 98.6 af. This volume is roughly equivalent to diversion of 0.41 cfs for 121.2 days (March, April, October, and November). The volume for cooling under 63-33245 can be 45.5 af, which is equivalent the 0.15 cfs additional diversion rate authorized for cooling under 63-33245 for the months of May, June, July, August, and September.

If the Department decides to maintain the restricted volume amounts based on efficient operation, without efficient operation being a condition of the permit, please provide the statute or administrative guidance that authorizes such a policy.

As always, SPF appreciates the Department's attention to our concerns. Please call me if you have any questions.

Sincerely,



Lori Graves
Water Rights Specialist

Cc: Ken Howell

SPF file number: 722.0010