



State of Idaho

DEPARTMENT OF WATER RESOURCES

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C.L. "BUTCH" OTTER
Governor

GARY SPACKMAN
Director

August 24, 2017

BROCKWAY ENGINEERING
ATTN G ERICK POWELL
2016 N WASHINGTON STREET SUITE 4
TWIN FALLS ID 83301

RE: Field exam report for water right permit 71-10953

Dear Mr. Powell:

I have reviewed the field exam you supplied for water right permit 71-10953. During my review I discovered that field exam is deficient. Until the following issue is resolved, we cannot re-instate the permit and cannot accept the field report submitted with the proof of beneficial use statement. I will discuss the deficiency below:

VOLUME OF THE HEATING USE:

The Idaho Administrative Code Beneficial Use Examination Rules, IDAPA 37.03.02.035.02.d addresses these issues are as follows:

j. For each use of water the examiner shall report an annual diversion volume based on actual beneficial use during the development period for the permit. The method of determining the annual diversion volume shall be shown. The annual diversion volume shall account for seasonal variations in factors affecting water use, including seasonal variations in water availability. For irrigation, the volume shall be based on the field headgate requirements in the map titled Irrigation Field Headgate Requirement appended to these rules (see Appendix A located at the end of this chapter). Annual diversion volumes for heating and cooling uses may be adjusted to account for documented weather conditions during any single heating or cooling season from among the fifty (50) years immediately prior to submitting proof of beneficial use for the permit. For storage uses that include filling the reservoir and periodically replenishing evaporation and seepage losses throughout the year, the annual diversion volume shall be the sum of the amounts used for filling and for replenishment. Volumes may include reasonable conveyance losses actually incurred by the water user. The following water uses are exempt from the volume reporting requirement: (3-29-12)

As you can see from the IDAPA rule shown above, all field exams reports for heating uses require a volume for that use. Your report did not provide any volume calculations or recommendations. In order to accept this field report a reasonable volume recommendation must be included with the field report.

Volumes for heating uses are usually determined by calculating the amount of water required to operate the installed heat pump, the square footage being heated, the difference in temperature between the home temperature to outside temperature, and the amount of time the heat pump is required to operate to maintain the needed inside temperature for the year. If you don't have access to this information, you may try to contact the heating unit installer/designer to provide you with the system design information that should include the amount of water required to operate the heating system throughout the year. Most heating systems are designed based on these criteria, and they should have reasonable knowledge of what the volume of water is needed to properly heat the home year round. Volumes calculated without taking into account the information above will not be acceptable unless you can provide calculations that reflect current industry standards for designing a heating system for this specific sized home taking into account local temperature. This permit does not include a cooling use, so the information supplied can only address the amount of water needed for heating.

The IDAPA Beneficial Use Examination Rules 37.03.02.035.02.b states the following:

Field reports not completed as required by these rules will be returned to the certified water right examiner for completion. If the date for submitting proof of beneficial use has passed, the penalty provisions of Rule 055 shall apply. (7-1-93)

The Department has concluded that this field report is not completed as required by the IDAPA Beneficial Use Rules. Therefore we are returning the Proof of Beneficial Use Statement and Field Report to you for completion. If the certified field exam report is not resubmitted within 30 days or by September 25, 2017. The permit will be considered lapsed, and a lapsed notice will be sent.

Respectfully,



Daniel Nelson

Staff Hydrologist

Idaho Department of Water Resources

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