

November 18, 2016

James Cefalo
Idaho Department of Water Resources
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718

Re: Global Ag Properties

Dear Mr. Cefalo:

The first transfer is for 183.9 acres of primary irrigation water from water right 35-7168. The location in which this water will be moving has existing wells, main lines and delivery system already installed.

The ownership, POU and POD will be changing with this transfer. The period of use and beneficial use will not be changing.

It was required to run the ESPA model analysis tool to examine this transfer. The transfer analysis tool indicated that transient mitigation would be required in three Snake River Reach areas. However, the transient results do not need to be mitigated for because of the transient state values are equal to the steady state values. The Transient State: 2 Part Test Caveat explains that if all three checks are not exceeded for the steady state analysis and the transient state checks are equal to the steady state checks. Then no mitigation is required for the transfer. A copy of a few slides from an IDWR power point explaining the 2 Part Test Caveat is attached to this letter. Therefore, no mitigation is required for this transfer to be approved by IDWR.

Please copy our office on all correspondence regarding this application.

Sincerely,



Greg Sullivan, M.S., Engineer

Enc: Transfer Application, Aerial Maps, ESPA Model Analysis, Warranty Deeds, Annual Report for Global Ag Properties