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Department of Water Resources  
Eastern Region

November 18, 2016

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

Re: T6 North Farm Transfer

Dear Mr. Cefalo:

MPH Farms LLC is proposing two water right changes on the farm locally recognized as the T6 North Farm. It is necessary to inform IDWR that variable rate irrigation (VRI) pivot packages are going to be installed on several of the pivots located on this farm. The VRI package will allow the pivot nozzles to be turned off as the pivot travels over rock piles or unproductive soil that has historically been irrigated. This irrigation application will greatly increase the efficiency of irrigation on this farm and allow an increase of crop production.

It is necessary to update the place of use of water rights 35-7857B, 35-7920B, 35-8606 and 35-8626 with a new 206 map that identifies the 543.5 acres that can be irrigated by these water rights.

The transfer proposes to move 259.9 acres of primary water from water rights 35-2072 and 35-8791 for 136.0 acres and 35-2306 and 35-8197 for 123.9 acres. A spreadsheet of historical pumping volumes based on data downloaded from the WMIS database are attached to this letter. The historical pumping volumes indicate that these water rights have been used fully to irrigate the maximum allowed acres under these water rights.

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.

Monty Funk and Carolene Funk own property Parcel RPD0067-00 that is located at 06S 29E Sec 9 W1/2 of the NW1/4. The Funk's have given permission to MPH Farms LLC to include this property in the POU and PPU of water rights owned by MPH Farms LLC.

There are existing wells that will be used as the new PODS, the ownership of the water rights will not be changing, the beneficial use will not be changing and the period of use will not be changing.

Please copy our office on all correspondence regarding this application.

Sincerely,



Greg Sullivan, M.S., Engineer

Enc: Transfer Application, Aerial Maps, ESPA Model Analysis, Funk and MPH Contract of Agreement, WMIS Historical Volume Spreadsheet, 206 Map