



State of Idaho

DEPARTMENT OF WATER RESOURCES

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C.L. "BUTCH" OTTER
Governor

GARY SPACKMAN
Director

January 11, 2016

BLAINE CO SCHOOL DISTRICT
C/O SPF WATER ENGINEERING
CHRISTIAN R PETRICH
300 E MALLARD DRIVE STE 350
BOISE ID 83706

COPY

RE: Monitoring Requirements for Permit 37-22545

Dear Mr. Petrich:

I am writing in response to your December 22, 2015 letter and proposed alternative monitoring plan associated with Permit 37-22545. The Department is generally agreeable to the proposed alternative plan outlined in your letter, but must recommend a few points of specification to the timeline of execution.

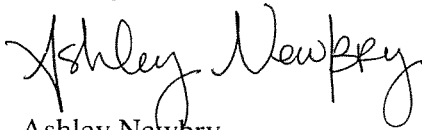
1. *Monitor and record aggregate production volumes (i.e., totalizer readings) and flow rates during the days in which the school is open for operation (may include summer, but excludes measurements on weekends and school holidays) through July 2020.*
2. *Note the number of production wells in operation at the time of each production reading noted in Item 1.*
3. *Measure and record injection-well water levels.*
 - a. *Measure injection-well groundwater levels on an approximate monthly basis in December, January, February, July, and August (months of peak production).*
 - b. *Attempt to have measurements coincide with days of peak system production and injection rates.*
 - c. *Measure and record groundwater levels in the Wood River High School Well No. 8 on the same days that groundwater levels are measured in the injection wells.*
 - d. *Continue injection-well and Well No. 8 measurements as described above through March 2017.*
4. *Compile and interpret data and information collected as part of the above-listed monitoring activities during the spring of 2017 to address the question of potential injury to existing water users as a result of injection under Permit 37-22545.*
 - a. *Include annual diversion volumes through heat exchangers.*
 - b. *Include maximum flow rates through heat exchangers.*
 - c. *If the system has a bypass (extraction directly to injection), include annual volumes of bypassed water.*
 - d. *Provide an analysis of the potential to raise groundwater levels in the vicinity of the injection wells (i.e., in the vicinity of the school campus and surrounding area). Discuss whether the system operation could create a perched water table. **Discuss the likelihood that Well No. 8 effectively represents any fluctuations in local groundwater levels.***

- e. Confirm that the capacity of the heat exchangers is congruent with the pumping rate (i.e., indicate whether or not pumped water is beneficially used).*
- 5. *Submit a revised proof of beneficial use after July 31, 2020 but prior to October 1, 2020.*
 - a. Include a compilation of water diverted under Permit 37-22545 through July 2020.*
 - b. Include a copy of the above-described analysis addressing the question of potential injury to existing water users as a result of injection under Permit 37-22545.*

In conjunction with item no. 4, the permit holder or their designated representative shall submit a check-in report during the month of April 2017. The report should include measurements and discussion points necessary to fully interpret item nos. 1 through 4 above, for early 2016 through March 2017.

The Department will review the report and make a determination of the need to perform further depth-to-water measurements (item no. 3) during the development period. If necessary, the Department will notify the permit holder or their designated representative that further measurements outlined in item no. 3 should be obtained. The Department also reserves the right to require depth-to-water measurements (item no. 3) for the remainder of 2017, 2018, 2019, and/or 2020. Item nos. 1, 2, 4, and 5 should be carried out through the remainder of the development period, through 2020.

Thank you,



Ashley Newbury
Associate Engineer