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DEPARTMENT OF
WATER RESOURCESSTATE OF IDAHO
DEPARTMENT OF WATER RESOURCES

\$50 fee

Received by djRecpt No. 000887Date 8-17-15

REQUEST FOR EXTENSION OF TIME

To provide additional time in which to submit proof of beneficial use for a water right permit

The Idaho Department of Water Resources will consider this form a request that the permit holder(s) be granted an additional period of time under the provisions of Section 42-204, Idaho Code, in which to complete development of a water right and file proof of beneficial use of water. There is a **FILING FEE** of \$50.00 to be included with this form when filed with IDWR.

Permit no. 35-13918 Date proof is due OCTOBER 01, 2015Name(s) of permit holder(s) GROVELAND WATER + SEWER DISTRICTMailing address PO BOX 833 City BLACKFOOT State ID Zip 83221Telephone no. 208-785-4902 Email applegraph@LIVER.COM

Describe what work has been completed toward the development of this water right:

If no work has been completed, show "none".

NONECosting \$ 0

The permit holder(s) has been unable to complete the remainder of the work for the following reasons:

The District has not been able to obtain approval from DEQ to proceed with Mr. Teeple's project. See attached letter from DEQ dated April 15, 2014. Also see the e-mail from Clem Yancey to Craig Borrenpohl showing the District's willingness to comply with DEQ.

Permit holder(s) request an extension for 5 year(s).Clem Yancey

Signature (If other than permit holder, Power of Attorney must be supplied)

August 14 2015

Date

ACTION OF THE DEPARTMENT OF WATER RESOURCES

The Department has reviewed the explanation for delay and concludes the reason(s) for delay meets the requirements for approval of the Request for Extension of Time as provided by Section(s) 42-204 and/or 42-218, Idaho Code.

☐ IT IS HEREBY ORDERED that the permit is **REINSTATED** with the priority date advanced to _____, 20____.

☒ IT IS HEREBY ORDERED that the above request for extension of time is **APPROVED**, and the time within which to submit proof of beneficial use is extended to September 2, 2016.

Signed this 23rd day of September, 2015

Jeff Peppersack, Chief
Water Allocation Bureau



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

444 Hospital Way, #300 • Pocatello, Idaho 83201 • (208) 236-6160
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

April 15, 2014

Groveland Water and Sewer District
P. O. Box 833
Blackfoot, ID 83221

Groveland Water and Sewer District:

Thank you for meeting with Idaho DEQ on March 6, 2014 to discuss your request to allow 20 additional hook-ups to the Groveland Public Drinking Water System. Our discussions revolved around whether a second well would be required prior to allowing these additional hook-ups. After our meeting I researched the issue by reviewing the prior facility planning studies, relevant IDAPA drinking water rules, and requested the input of Idaho DEQ engineers and staff in other regions and at that state office. Following is a review of that background work as well as a response to the request for additional connections with relevant IDAPA rule siting included.

IDAPA 58.01.08, "Idaho Rules for Public Drinking Water Systems" Section 513 discusses the number of ground water sources that are required for existing systems as quoted below.

513. FACILITY AND DESIGN STANDARDS: NUMBER OF GROUND WATER SOURCES REQUIRED – EXISTING SYSTEMS.

Existing community water systems served by ground water and intending to serve more than twenty-five (25) connections or equivalent dwelling units are subject to the following requirements for the number of ground water sources required. (5-8-09)

01. Existing System with All Sources Constructed Prior to July 1, 1985. A community water system served by ground water and with all existing sources constructed prior to July 1, 1985 will be required to comply with Subsection 501.17 upon substantially modifying the system after July 2002. (5-8-09)

02. Existing System with Any Sources Constructed After July 1, 1985. A community water system served by ground water with any sources constructed after July 1, 1985 is required to comply with Subsection 501.17 when a modification is made to the system which increases the population served or number of service connections, increases the length of transmission and distribution water mains, or increases the peak or average water demand. (5-8-09)

IDAPA 58.01.08 Section 501.17 requires ground water source redundancy for Public Drinking Water Systems and therefore a minimum of two (2) sources are required if the system is intended to serve more than twenty-five (25) connections. Consequently if Groveland's groundwater source was constructed after July 1, 1985 the system would need a second well prior to any modification being made to the system and if the Groveland well was constructed before July 1, 1985 than source redundancy and other requirements would be required when a substantial modification is made to the system.

Previously submitted facility planning studies for the Groveland system included a well driller's report for the Groveland well. That report indicated drilling activities took place from January 30, 1985 through June 10, 1985. While it appears drilling activities were completed prior to July 1, 1985 the well would not have been adequately outfitted with the necessary equipment and approved to serve the patrons of the Groveland Public Water System until after July 1, 1985. A decision was requested from the state office on what constituted the completion of a source as this would impact Groveland directly due to the unusual timing of the drilling of your well. The state office, with the concurrence of the other regional engineers, indicated the source is considered constructed when well drilling activities have been completed. In this case that date would be prior to the specified date of July 1, 1985 and Groveland will be required to meet source redundancy requirements when a substantial modification is made to the system.

A water system is defined as being substantially modified in IDAPA 58.01.08, "Idaho Rules for Public Drinking Water Systems" when, "as the result of one (1) or more projects, there is a combined increase of twenty-five percent (25%) or more above the system's existing configuration in the population served or number of service connections, the total length of transmission and distribution water mains, and the peak or average water demand. (5-8-09)" An interpretation was also requested from the state office and the engineers from the other Idaho DEQ regional offices to ensure consistency in applying this definition. Regarding when this requirement is imposed the rule clearly states the system's existing configuration which is taken on the date of the rule acceptance, May 8, 2009. Therefore with the stated number of 54 existing connections an additional 20 connections would be a substantial modification and would only be allowed after the completion of all rule requirements including a second source of water.

While the previous facility planning studies all included recommendations which would provide for additional growth potential for the system it does not appear any of the recommended alternatives of those previous studies have been fully implemented. The Groveland Public Water System appears to be currently operating below its design capacity as the design recommendations have yet to be completed. The first study DEQ has on record was completed by Forsgren-Perkins Engineering in 1985 which recommended two wells should be completed to serve the users of the water system. All subsequent studies have noted the need for additional storage or source water yet as noted these recommendations do not appear to have been completed.

Regarding the number of additional connections which would be allowed to the Groveland Public Drinking Water System before the substantial modification threshold would be

breached; traditionally DEQ will evaluate a proposal which includes all the relevant information rather than provide a water system with a threshold number. DEQ does not have the required information to allow for an analysis and will rely on a proposal from the system with all the relevant information so DEQ can evaluate a proposal. From the definition of substantially modified, the three separate contributing factors of service connections, length of mains, and water demand are additive. Therefore an evaluation would be based on knowing the proposed percentage increase in all three areas. Total increases which sum to twenty-five percent (25%) or more would be seen as a substantial modification to the system.

A rough estimate would be possible if we assume the additional connections would bring an equal percentage increase to the Groveland Public Water System for each category of water mains, water demand, and service connections. If this were the case you could multiple the existing number of connections by eight percent (8%) to arrive at an allowable number of additional connections or approximately four (4) new connections for the Groveland system. Again this is a rough estimate and more detailed information would be required to make a final determination.

Idaho DEQ understands the difficulties faced by the Groveland Water and Sewer System in planning for improvements and then funding the recommended improvements. DEQ is encouraged to hear Groveland is planning for the anticipated growth in the area and may be seeking grant funds to assist in that effort. As I'm sure you are aware, DEQ provides matching planning grants and low interest construction loans but we have also assisted systems in their public education efforts in order to make the passage of a bond election more likely. If we may assist you in that effort please let us know. You may contact me at (208) 236-6160 or via e-mail at craig.borrenpohl@deq.idaho.gov should you have questions or require additional information.

Sincerely,



Craig M Borrenpohl, P.E.
Water Quality Engineer

cc: Tom Hepworth – DEQ – PRO (e-mail)
Barbara Jones – DEQ – PRO (e-mail)

Clem Yancey

Mon, Jan 12 6:35 AM

to Craig.Borrenpohl@deq.idaho.gov; Luke Jolley; Mary Ellen Braithwaite; Ty Teeples

GWSD Second Well

1 file attached ^



DEQ Teeples Water L...

doc 25.5 KB

Mr. Teeples, who is hoping to build a subdivision, has contacted Groveland Water and Sewer District and is anxious to move forward with his plan to build twenty homes. The District needs to drill a second well to come into compliance with your standards. Receiving hook-up fees from Mr. Teeples would help make that possible.

On December 2, 2014, you received an e-mail from Luke Jolley with Harper-Leavitt Engineering, Inc., in which he attached the draft compliance waiver request in our letter to you dated December 1.

We have also applied for the Idaho's Drinking Water Facilities Planning Grant and Idaho Department of Environmental Quality Drinking Water Loan Letter of Interest. In addition, Groveland Water and Sewer District has completed the Annexation Project which includes about eighty acres and encompasses Mr. Teeples' property.

We are still waiting for your response to our letter dated December 1, 2014. Your decision to our draft compliance waiver request is needed for Groveland Water and Sewer District and Mr. Teeples to come to agreement about the construction of his subdivision. Mr. Teeples is hoping to begin construction in early spring of 2015.

If you have any questions, feel free to contact me. Our letter of December 1, 2014 is attached for your convenience. We thank you for your help.

Sincerely,

Clem Yancey

A handwritten signature in cursive script that reads "Clem Yancey".

Sent from Windows Mail