

AVONDALE IRRIGATION DISTRICT

Providing Exceptional Drinking Water & Service Since 1908

October 28, 2014

RECEIVED

OCT 30 2014

DEPARTMENT OF
WATER RESOURCES

Gary Spackman, Director
Idaho Department of Water Resources
322 East Front Street
PO Box 83720
Boise ID 83720-0098

Re: Water Right Licenses 95-8687, 95-8774, 95-8867 & 95-8909

Dear Director Spackman:

We are writing to request a modification of the combined limits condition placed on the above referenced Water Right Licenses. Avondale Irrigation District is preparing to file a new Application for Permit to Appropriate Water for lands recently annexed into the district. As part of the preparation to file that application, we reviewed the water rights already issued to the district by the department. This review revealed what we believe is an error in the flow and volume limits placed on those rights. The district holds 7 licenses, 3 of which were issued prior to the beneficial use exam done for the above referenced rights.

The district's first development consisted of three wells, referred to as Miles 1, 2 & 3 (95-7558, 95-8144 & 95-8321.) Diversion capacity for those wells was found to be 11.81 cfs by the examiner. Since that first development the district has added three more wells, one which was gifted to the district called the "Finucane Well", and two which drilled by the district referred to as Airport 1 & 2.

Water Right Permits were obtained for the use from these wells. All six of the wells are tied together in a common system. In 2007 Mr. Shaun Maxey of your Northern Regional Office conducted a beneficial use field exam for those permits which was the basis of licenses issued in 2009. His exam was very thorough. He collected measured flow data and also computed theoretical calculations on flow based HP, dynamic head and efficiency. The measured and computed values were close except for the Miles complex. At the time of his exam all the water from all three pumps went through a single flow meter which meant switching pumps on and off to get flow data for each well. The district has since added individual meters at each well. Mr. Maxey measured 1000gpm (2.22cfs) for each well even though wells 1 & 3 are 350 hp pumps and well 2 has a 200 hp. I cannot explain why the measurements were incorrect. The pumping equipment is the original and has not been modified since the first beneficial use exams were done in 1981. Our records since adding those individual meters show that there has not been any change pumping capacity.

AVONDALE IRRIGATION DISTRICT

Providing Exceptional Drinking Water & Service Since 1908

Mr. Maxey's field report contains this statement, "The combined use condition for 95-8687, 95-8774, 95-8867 and 95-8909 was determined by using the sum of the measured CFS for each right plus the CFS from previously licensed rights 95-7558, 95-8321 and 95-8144." We believe this condition is appropriate. However, when the combined use limit condition was calculated 6.66 cfs was assigned those existing rights instead of 11.81 cfs.

We respectfully request that the combined use flow limitation for 95-8687, 95-8774, 95-8867 and 95-8909 be changed from 13.94 cfs to 19.09 cfs and the volume limit be changed from 10092.2 AF to 13855.1 AF.

If you believe verification of the flow capacities of the three Miles wells is needed, we would invite one of your representatives to do so.

Thank you for your consideration. If you have any questions, please contact me.

Sincerely,



Bob Chandler
District Manager