

## MEMORANDUM

**Date:** December 07, 2012  
**To:** Transfer 78181  
**From:** ddunn  
**Re:** Comment/Analysis

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This transfer proposes to consolidate ground water rights 17-2052 and 17-7063 onto a smaller irrigated place of use, 316 acres. This consolidation will allow for a higher diversion rate. Currently the diversion rate is about .25 miners inches per acre. This transfer will bring the diversion rate close to .33 miners inches per acre.

The transfer also proposes adjusting the season of use for the rights to match the standard irrigation season of use for the area. Condition X61 was added to 17-2052 where the season of use was expanded. For 17-7063, the season of use was reduced by one day.

**Authority to File:** The applicant is the current owner of water rights 17-2052 and 17-7063. The applicant currently owns the ground under irrigation according to Oneida County tax lot data.

**Water Right Validity:** Current 2011 air photography shows the land is irrigated.

**Injury to Other Water Rights:** There will not be any injury to any other ground water rights. This transfer is not moving the point of diversion.

Review of this application finds there is not any inconsistency with the criteria set forth in Section 42-222 Idaho Code preventing the processing of this application.