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SPF WATER ENGINEERING

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DEPARTMENT OF WATER RESOURCES

April 13, 2011

Shelley Keen
IDWR State Office
PO Box 83720
Boise, ID 83720-0098

Subject: Water Right Options for Permit 63-12593

Dear Shelley:

In December, Terry and I had a conference call with you and other IDWR staff regarding the heating and cooling system serving the Idanha Building authorized under permit 63-12593. Currently, the permit is conditioned so that water is required to be diverted and re-injected through a closed loop system. We are exploring options to allow the spent water to be discharged to the ACHD storm water system rather than using the injection well. As a result of our discussion, the Department requested the following information be provided to assist them in determining the best approach for permit holder to pursue.

1. *What is the history of the injection well performance? Has it always, gradually or just recently declined in its ability to accept injection flow?*

   The well has always resisted the injection flow and has gradually worsened to the point that all flow is now rejected.

2. *Does Parklane wish to use the injection well as a 2nd production well?*

   Yes.

3. *What is the pumping capacity of the existing production well?*

   The pump curve suggests 150 gpm with a 150' pumping water level and 60 psi.

4. *What flow rate (gpm) does the heating/cooling system require?*

   The heat exchanger has a capacity of 1,150 gpm, but has been operated using less.

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The possible water right options discussed during our conference call included the following:

- Changing the conditions of the permit during permit licensing through the licensing amendment process
- Licensing the permit with the injection well component, then filing a transfer application to change the water right requirements for use of the injection well
- Filing a new permit that does not propose use of an injection well

Proof of beneficial use for permit 63-12953 was due 11/1/2001 and submitted 10/1/2001. To date, a licensing field exam has not been made. Parklane Company has received approval from ACHD to discharge their spent cooling water into ACHD's storm water drain system located in the alley behind the Idanha Building.

Thank you for your attention to this matter Shelley. We look forward to your recommendations. Please let me know if you have any further questions.

Sincerely,

Lori Graves
Water Rights Specialist

Cc: Ken Howell, Parklane Co., Inc
Doug Bolen, Parklane Management Co.

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