

MEMORANDUM

DATE: August 16, 2010

TO: Water Right File 63-32256

FROM: Shelley W. Keen 

RE: Request for Extension of Time to Complete Transfer

This morning I spoke on the telephone with Julie Schelhorn about her request for four additional years to complete Transfer 75058. She told me that she is not diverting water at the previously authorized point of diversion while pursuing the new one.

I also spoke with Jeff Peppersack about whether those who have not yet completed their transfers can continue to divert and use water at the old locations. Jeff thinks a transfer recipient can continue to divert and use water at the old location until the transfer is completed at the new location, even if IDWR allows five years to complete the transfer. I expressed concern about use at locations that are no longer authorized and about the potential for "double dipping" at the old and new locations. Jeff acknowledged the concerns, but he thinks IDWR has reason to be lenient during tough economic times.