

Keen, Shelley

From: Sheila Daniels [sheila.daniels@brockwayeng.com]
Sent: Tuesday, June 22, 2010 9:06 AM
To: Keen, Shelley
Cc: Chuck Brockway
Subject: Dry Lot LLC Transfer and Permit Measuring Devices
Attachments: LtrSKeenIDWR.doc

Shelley,

Enclosed is a letter from Charles E. Brockway regarding Dry Lot, LLC. Please contact our office if you have difficulty receiving this document or have any questions.

Sincerely,
Sheila Daniels
Administrative Assistant to Charles E. Brockway
Brockway Engineering
2016 Washington St. N., Suite #4
Twin Falls, ID 83301
(208) 736-8543

June 21, 2010

Shelley Keen
Idaho Department of Water Resources
322 East Front Street
P.O. Box 83720
Boise, ID 83720-0098

Re: Dry Lot LLC Transfer and Permit Measuring Devices

Dear Shelley:

The current draft permit 37-22252 for Dry Lot LLC was modified from the original draft to require data logger(s) on the existing flow meters for the two municipal wells in order to 'determine the daily volume of water diverted' and 'maintain consistency with the conditions of Transfer 74449 and to provide for proper administration of the water right'.

I understand the need for daily volume determination on the new meter on the aquifer recharge system in order to administer the condition on Transfer 74449 which requires limits on the rate or input and periodic recharge volumes. However, the requirement for daily pumping volumes from the two existing wells does not appear to provide any additional useful information for administration of the permit. The current wells are utilized to pump the authorized volumes under water right 37-37-8810 and 37-8613 which allows diversion of in-house water, irrigation of 99 existing residential lots and use for a clubhouse/restaurant, and recreation center. The permit and recharge program to be authorized under Transfer 74449 and Permit 37-22252 would authorize additional diversion from the same wells of the 74.5 acre feet of water recharged annually for irrigation of an additional 27.5 acres of turf within the subdivision.

Measurement and reporting of daily flows from the two wells does not provide sufficient data to determine whether or not the recharged volume is being exceeded on a daily basis and there is no condition on Transfer 74449 or Permit 37-22252 which requires that the daily volume of recharged water pumped cannot exceed the daily recharge volume. Condition 6 of Permit 37-22252 provides only that 'the annual volume of water diverted under this right shall not exceed the annual volume of water delivered into the infiltration basin(s) for ground water recharge under rights 37-22313, 37-22318 and 37-22323 as measured at the point(s) of recharge'.

The existing flow meters on the two wells are McCrometer in-line Mag 500 meters with instantaneous flow indicators and totalizers. These flow meters can be checked to determine if they meet the requirements for existing mechanical type flow meters as outlined in section B of the 'Minimum Acceptable Standards for Open Channel and Closed Conduit Measuring Devices'. In addition, these meters include hour meters which mechanically log total hours run time. Both well pumps are constant speed pumps so the hour meters can be used to determine volume pumped at any frequency of reading.

Currently, Valley Club HOA personnel check the pumps and read and record all meter data at least once per month. These readings can be more frequent if necessary. The currently installed meters and totalizers are adequate to document the annual, monthly and more frequent pumped volumes as necessary and, in my opinion, will allow adequate administration of the conditions of the transfer and permit to assure that none of the provisions are violated.

I am therefore requesting that Condition 7 of Permit 37-22252 requiring the installation of data loggers on the two existing wells be waived and the use of the existing flow meters and hour meters be approved.

Sincerely,

Charles E. Brockway, P.E.