

MEMORANDUM

Date: September 13, 2007

To: Transfer File – 72674 and New Application in the Name of Comore Development, Inc.

From: Jeff Peppersack

Re: Review of Transfer Effects on Snake River Using Transfer Spreadsheet V3.1

This memo reviews Snake River effects due to transfer of points of diversion for rights in Basin 35, northwest of Blackfoot, to Basin 25, south of Idaho Falls using the new Transfer Spreadsheet Tool. Transfer 72674 proposes to move 1.26 cfs/401.6 afa under rights 35-2653, 35-12933, 35-2503A and 25-12706 to the new location for irrigation of 100 acres. Another transfer (no number assigned) proposes to move an additional 3.83 cfs/953.6 afa under right 35-13624 to the new location for irrigation of 238.4 acres.

Transfer 72674 was analyzed without mitigation reductions and then with reductions to limit increased effects to the Snake River to within 5% using the Transfer Spreadsheet Tool V3.1. The analysis was simplified by choosing one model cell for the FROM locations and one model cell for the TO locations because the wells were located in close proximity to each other. The analysis was also simplified by analyzing the irrigation use to occur in the summer trimester. Since the transfer does not propose a change in nature of use from the current irrigation use, the total volume authorized under the rights was used in the analysis instead of total depletion. Right 25-12706 was not included in the analysis due to the insignificant volume.

A summary of the data used for each analysis and resultant graphs are attached. The analysis without mitigation reductions shows increased effects to the Ashton to Rexburg (maximum about 5 af/trimester), Heise to Shelley (maximum about 12 af/trimester), and Shelley to near Blackfoot (maximum about 12 af/trimester) reaches of the river. The analysis with mitigation reductions shows that the diversions under the rights would be limited to 143 afa at steady-state (out of 395.4 afa) in order to limit the effects to within 5% of the original effects to each reach.

The other transfer was also analyzed without mitigation reductions and then with reductions to limit increased effects to the Snake River to within 5% using the Transfer Spreadsheet Tool V3.1. The analysis was simplified by choosing one model cell for the TO locations because the wells were located in close proximity to each other. The analysis was also simplified by analyzing the irrigation use to occur in the summer trimester. Since the transfer does not propose a change in nature of use from the current irrigation use, the total volume authorized under the right was used in the analysis instead of total depletion.

A summary of the data used for each analysis and resultant graphs are attached. The analysis without mitigation reductions shows increased effects to the Ashton to Rexburg (maximum about 10 af/trimester), Heise to Shelley (maximum about 29 af/trimester), and Shelley to near Blackfoot (maximum about 28 af/trimester) reaches of the river. The analysis with mitigation reductions shows that the diversions under the rights would be limited to 345 afa at steady-state (out of 953.6 afa) in order to limit the effects to within 5% of the original effects to each reach.

ESPA Ground Water Rights Transfer Spreadsheet Data Summary

TRANSFER NO: 72674
TRANSFER NAME: Comore

PREPARED BY: JP
DATE: 9/13/2007
Transfer Tool Version: Version 3.1

BLUE CELLS ARE SET UP FOR USER ENTRIES

WATER RIGHTS INVOLVED:

Group 1 Transfer Rights		Group 2 Additional Mitigation Rights	
Right No.	Priority Date	Right No.	Priority Date
35-2503A	5/6/1957		
35-2653	3/20/1961		
35-12933	5/1/1960		

HISTORIC BENEFICIAL USE:

Trans/Mit Rights (group no.)	Acres to Dry Up (ac)	Beneficial Use (af/yr)	Total (af/yr)
35-2503A	40.1		155.8
35-2653	30.7		122.8
35-12933	29.2		116.8
Total	100		395.4

MITIGATION NOTES

no mitigation proposed
other notes: - FROM wells located in two adjacent cells for the rights involved, used one cell to simplify - right 25-12706 also involved in transfer but not included in this analysis due to insignificant volume - TO wells located in 4 adjacent cells, used one cell to simplify

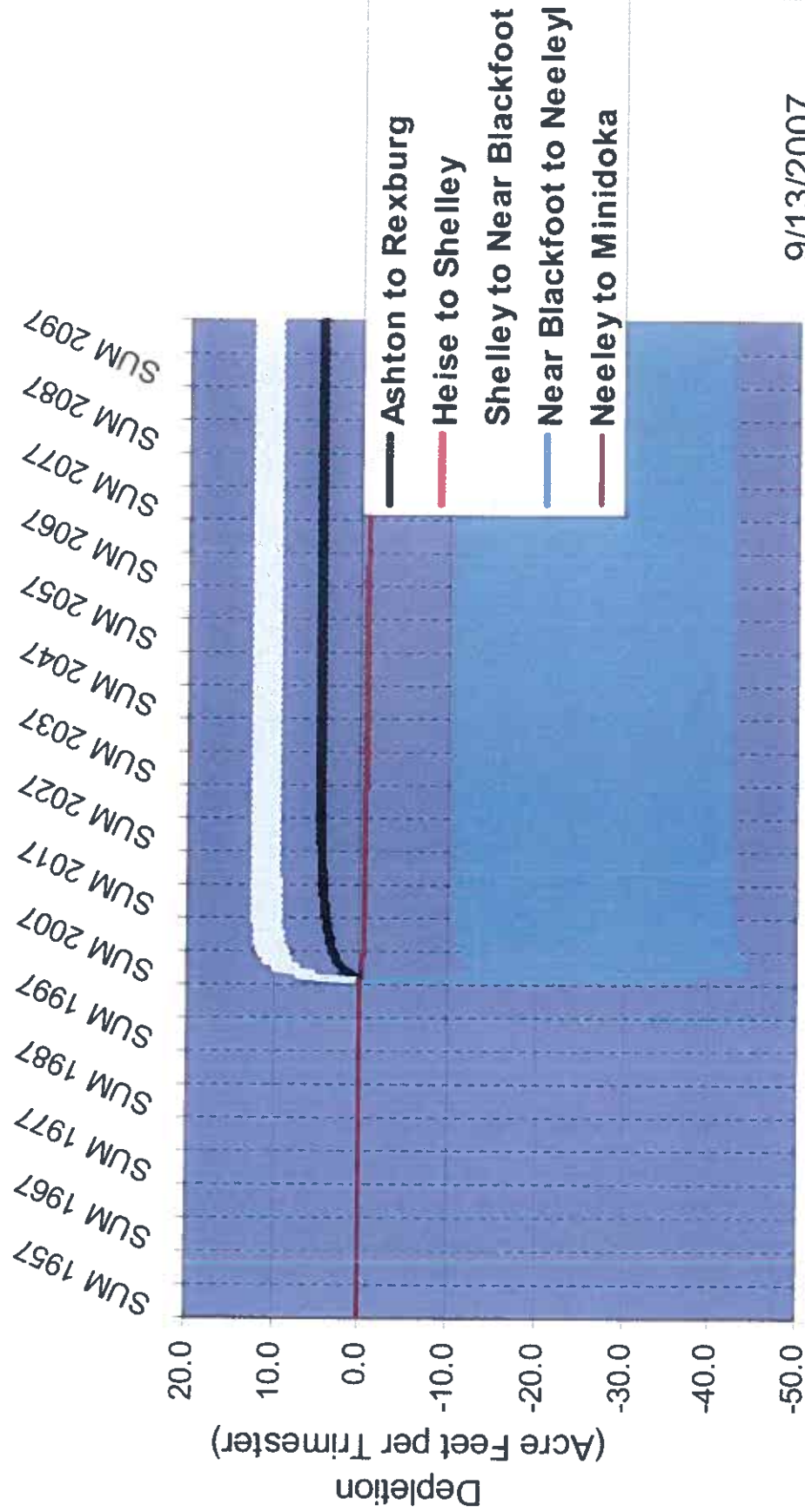
MODEL CELL LOCATIONS:

	TO WELL	FROM1 WELL	FROM2 WELL	FROM3 WELL
ROW	79	68	0	0
COLUMN	164	134	0	0

	Start Date		End Date		Water Use		Acres Authorized (acres)	Notes
	Season	Year	Season	Year	Annual (af/yr)	Trimester (af/trimester)		
TO Well (Projected Use)	summer	2008	summer	2106	395.4	395.4	100.0	use summer trimester to simplify
FROM1 Well (With Transfer)	summer	1957	summer	1960	155.8	155.8	40.1	use summer trimester to simplify
	summer	1961	summer	1979	278.6	278.6	70.8	
	summer	1980	summer	2007	395.4	395.4	100.0	
FROM1 Well (Without Transfer)	summer	1957	summer	1960	155.8	155.8	40.1	use summer trimester to simplify
	summer	1961	summer	1979	278.6	278.6	70.8	
	summer	1980	summer	2106	395.4	395.4	100.0	
FROM2 Well (With Transfer)								
FROM2 Well (Without Transfer)								
FROM3 Well (With Transfer)								
FROM3 Well (Without Transfer)								

WITHOUT MITIGATION 72674

Net Transfer Effect Above Milner **(Total Effect With Transfer - Total Effect Without Transfer)**



Customer Name: Comore

Transfer No: 72674

9/13/2007
Version 3.1

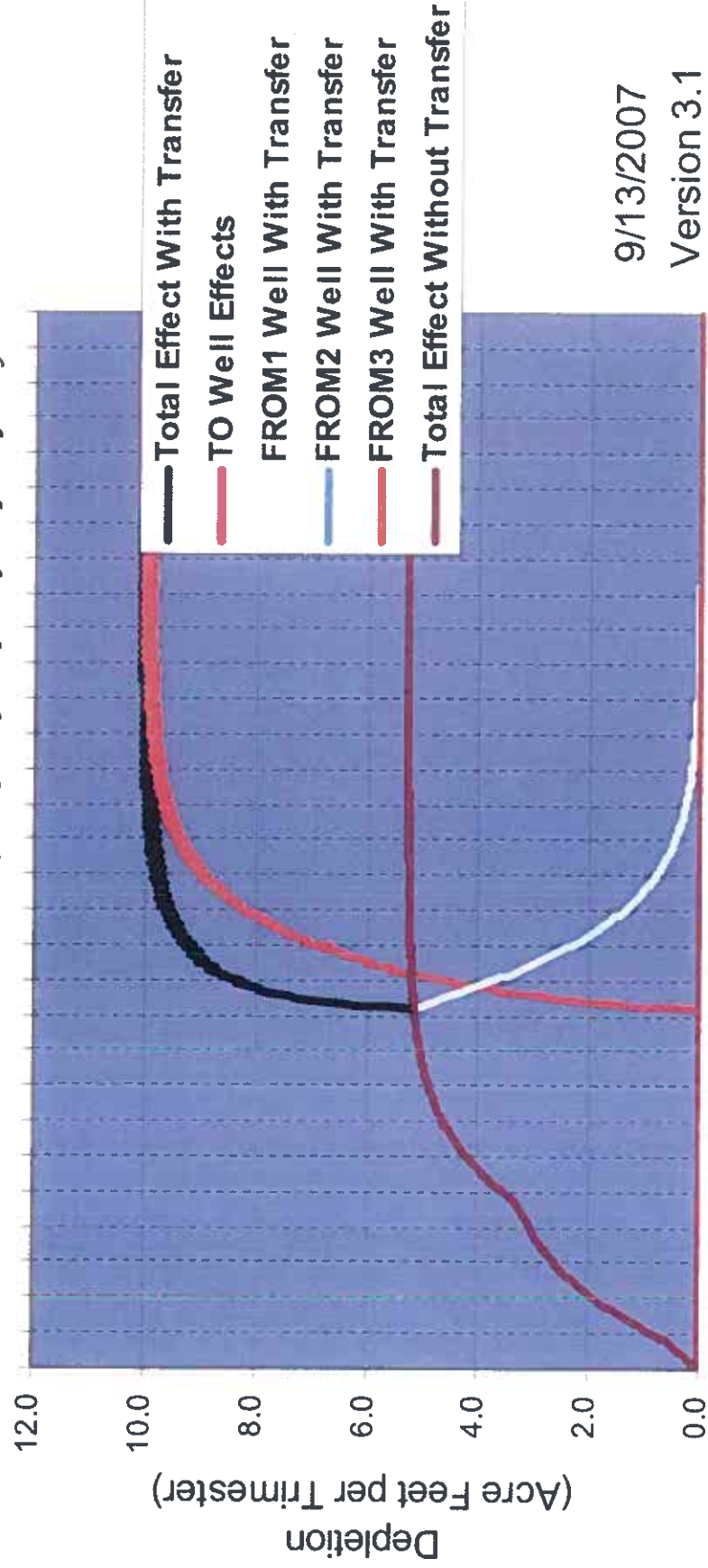
WITHOUT MITIGATION

Hydrologic Response--Ashton to Rexburg

Customer Name: Comore

Transfer No: 72674

SUM 1957
SUM 1967
SUM 1977
SUM 1987
SUM 1997
SUM 2007
SUM 2017
SUM 2027
SUM 2037
SUM 2047
SUM 2057
SUM 2067
SUM 2077
SUM 2087
SUM 2097



9/13/2007
Version 3.1

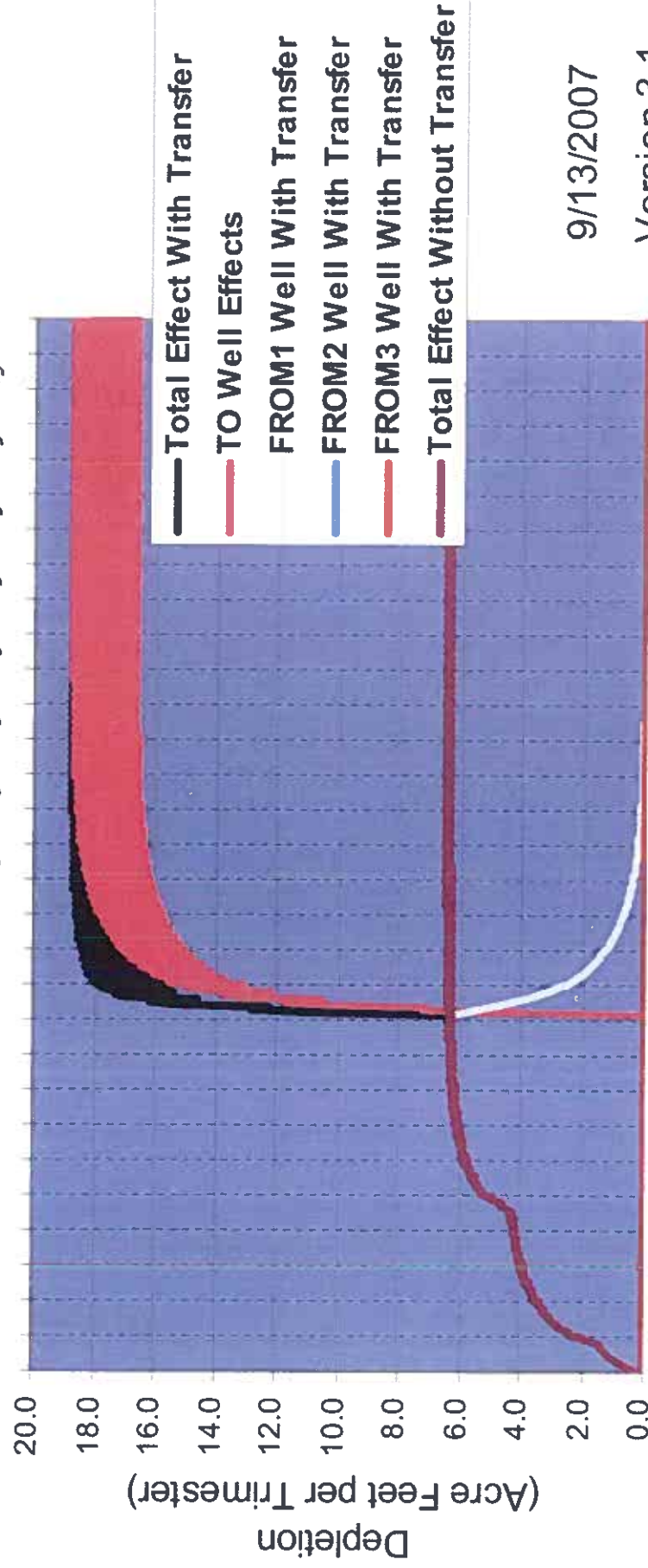
WITHOUT MITIGATION

Hydrologic Response--Heise to Shelley

Customer Name: Comore

Transfer No: 72674

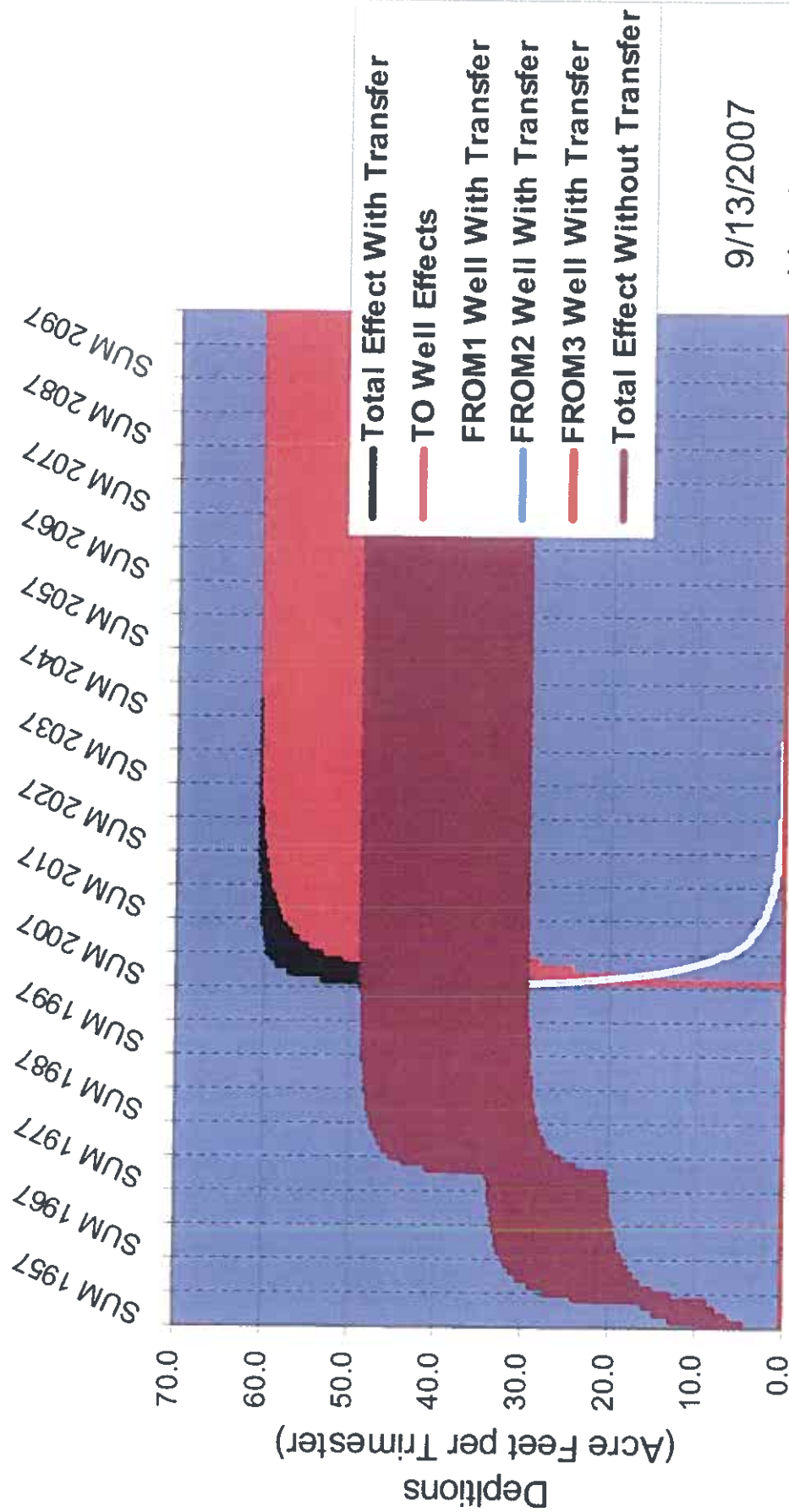
SUM 1957
SUM 1967
SUM 1977
SUM 1987
SUM 1997
SUM 2007
SUM 2017
SUM 2027
SUM 2037
SUM 2047
SUM 2057
SUM 2067
SUM 2077
SUM 2087
SUM 2097



WITHOUT MITIGATION

Hydrologic Response--Shelley to Near Blackfoot

Customer Name: Comore Transfer No: 72674



9/13/2007

Version 3.1

WITHOUT MITIGATION

ESPA Ground Water Rights Transfer Spreadsheet Data Summary

TRANSFER NO: 72674
TRANSFER NAME: Comore

PREPARED BY: JP
DATE: 9/13/2007
Transfer Tool Version: Version 3.1

BLUE CELLS ARE SET UP FOR
USER ENTRIES

WATER RIGHTS INVOLVED:

Group 1 Transfer Rights		Group 2 Additional Mitigation Rights	
Right No.	Priority Date	Right No.	Priority Date
35-2503A	5/6/1957		
35-2653	3/20/1961		
35-12933	5/1/1980		

HISTORIC BENEFICIAL USE:

Trans/Mit. Rights (group no.)	Acres to Dry Up (ac)	Beneficial Use (af/yr)	Total (af/yr)
35-2503A	40.1	155.8	155.8
35-2653	30.7	122.8	122.8
35-12933	29.2	116.8	116.8
Total	100	395.4	395.4

MITIGATION NOTES

With mitigation
other notes: FROM wells located in
two adjacent cells for the rights
involved, used one cell to simplify -
right 25-12706 also involved in
transfer but not included in this
analysis due to insignificant volume -
TO wells located in 4 adjacent cells,
used one cell to simplify

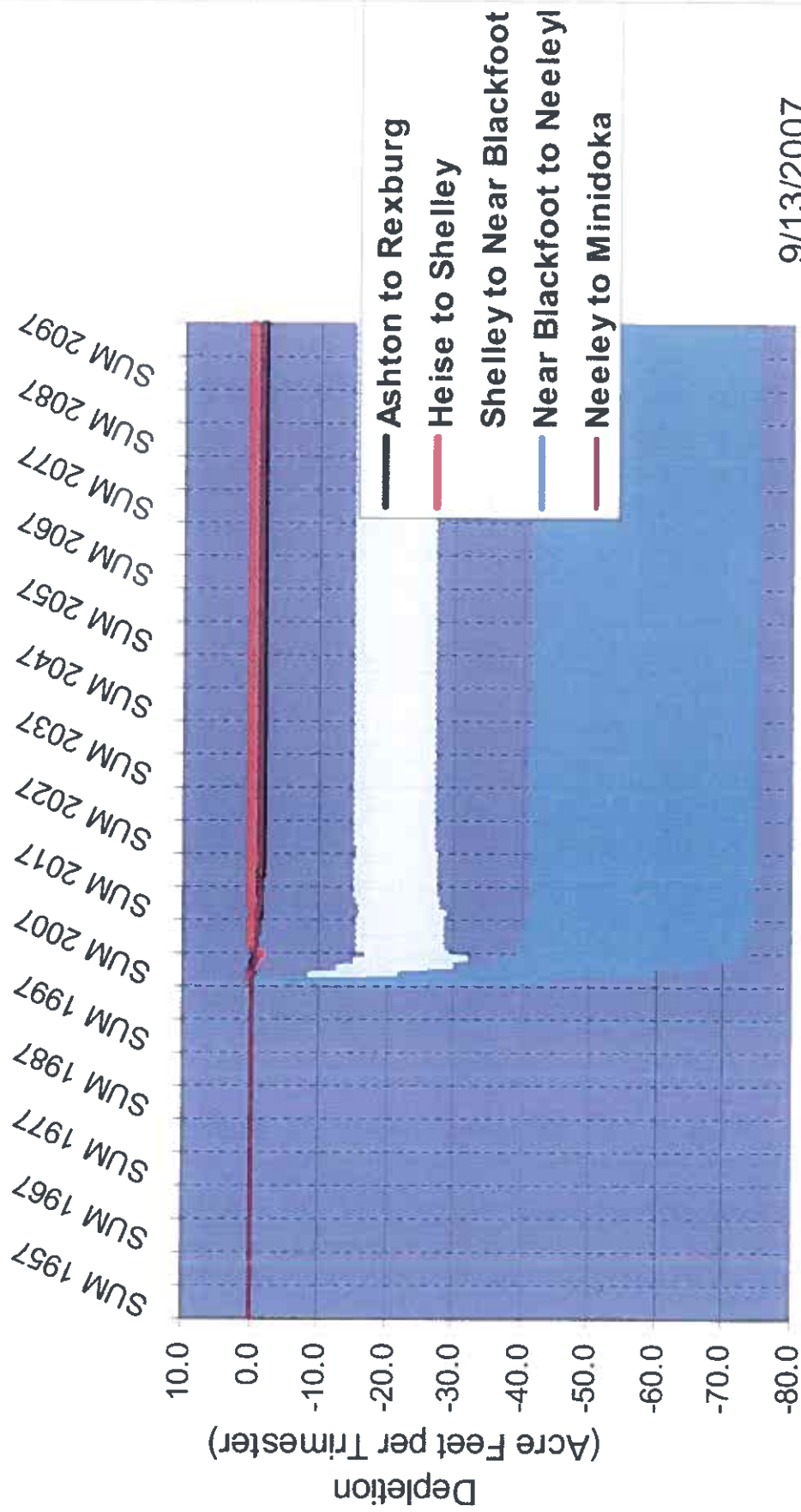
MODEL CELL LOCATIONS:

	TO WELL	FROM1 WELL	FROM2 WELL	FROM3 WELL
ROW	79	88	0	0
COLUMN	164	134	0	0

	Start Date		End Date		Water Use		Acres Authorized (acres)	Notes
	Season	Year	Season	Year	Annual (af/yr)	Trimester (af/trimester)		
TO Well (Projected Use)	summer	2008	summer	2011	66.0	66.0	100.0	use summer trimester to simplify
	summer	2012	summer	2018	125.0	125.0	100.0	
	summer	2019	summer	2027	138.0	138.0	100.0	
	summer	2028	summer	2106	143.0	143.0	100.0	
FROM1 Well (With Transfer)	summer	1957	summer	1960	155.8	155.8	40.1	use summer trimester to simplify
	summer	1961	summer	1979	278.6	278.6	70.8	
	summer	1980	summer	2007	395.4	395.4	100.0	
FROM1 Well (Without Transfer)	summer	1957	summer	1960	155.8	155.8	40.1	use summer trimester to simplify
	summer	1961	summer	1979	278.6	278.6	70.8	
	summer	1980	summer	2106	395.4	395.4	100.0	
FROM2 Well (With Transfer)								
FROM2 Well (Without Transfer)								
FROM3 Well (With Transfer)								
FROM3 Well (Without Transfer)								

WITH MITIGATION 72674

Net Transfer Effect Above Milner **(Total Effect With Transfer - Total Effect Without Transfer)**



9/13/2007
 Version 3.1

Transfer No: 72674

Customer Name: Comore

WITH MITIGATION

ESPA Ground Water Rights Transfer Spreadsheet Data Summary

TRANSFER NO: new
TRANSFER NAME: Comore

PREPARED BY: JP
DATE: 9/12/2007

Transfer Tool Version Version 3.1

BLUE CELLS ARE SET UP FOR
USER ENTRIES

WATER RIGHTS INVOLVED:

Group 1 Transfer Rights		Group 2 Additional Mitigation Rights	
Right No.	Priority Date	Right No.	Priority Date
35-13624	6/1/1989		

HISTORIC BENEFICIAL USE:

Trans/Mit Rights (group no.)	Acres to Dry Up (ac)	Beneficial Use (af/yr)	Total (af/yr)
35-13624	238.4		953.6

MITIGATION NOTES:

no mitigation proposed
other notes - TO well is in 4 adjacent
cells, used one cell to simplify

MODEL CELL LOCATIONS:

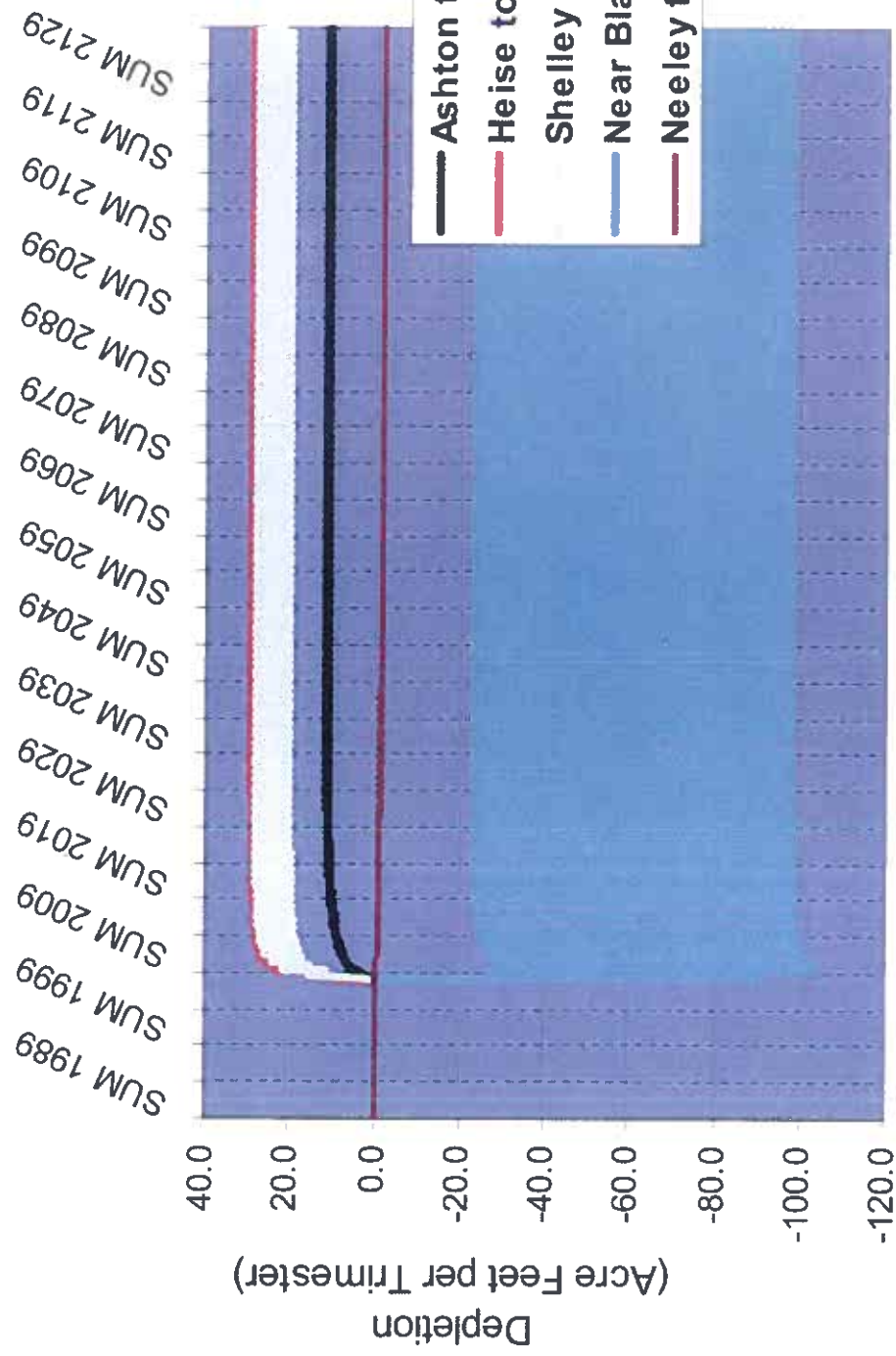
	TO WELL	FROM1 WELL	FROM2 WELL	FROM3 WELL
ROW	79	70	0	0
COLUMN	164	137	0	0

	Start Date		End Date		Water Use		Acres Authorized (acres)	Notes
	Season	Year	Season	Year	Annual (af/yr)	Trimester (af/trimester)		
TO Well (Projected Use)	summer	2008	summer	2138	953.6	953.6	238.4	use summer trimester to simplify
FROM1 Well (With Transfer)	summer	1989	summer	2007	953.6	953.6	238.4	use summer trimester to simplify
FROM1 Well (Without Transfer)	summer	1989	summer	2138	953.6	953.6	238.4	use summer trimester to simplify
FROM2 Well (With Transfer)								
FROM2 Well (Without Transfer)								
FROM3 Well (With Transfer)								
FROM3 Well (Without Transfer)								

WITHOUT MITIGATION

NEW

Net Transfer Effect Above Milner **(Total Effect With Transfer - Total Effect Without Transfer)**



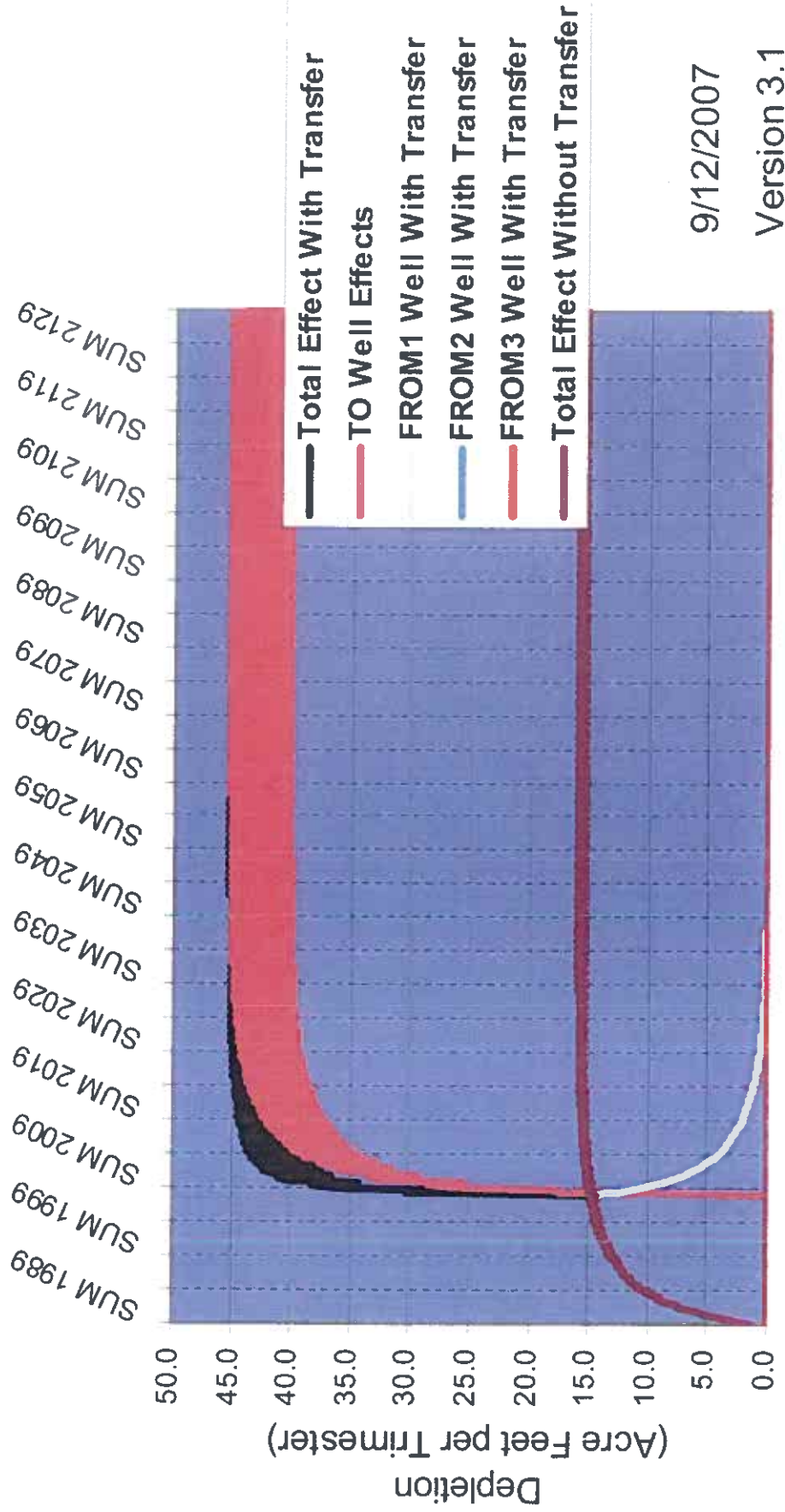
Customer Name: Comore

Transfer No: new

WITHOUT MITIGATION

9/12/2007
Version 3.1

Hydrologic Response--Heise to Shelley
 Customer Name: Comore Transfer No: new



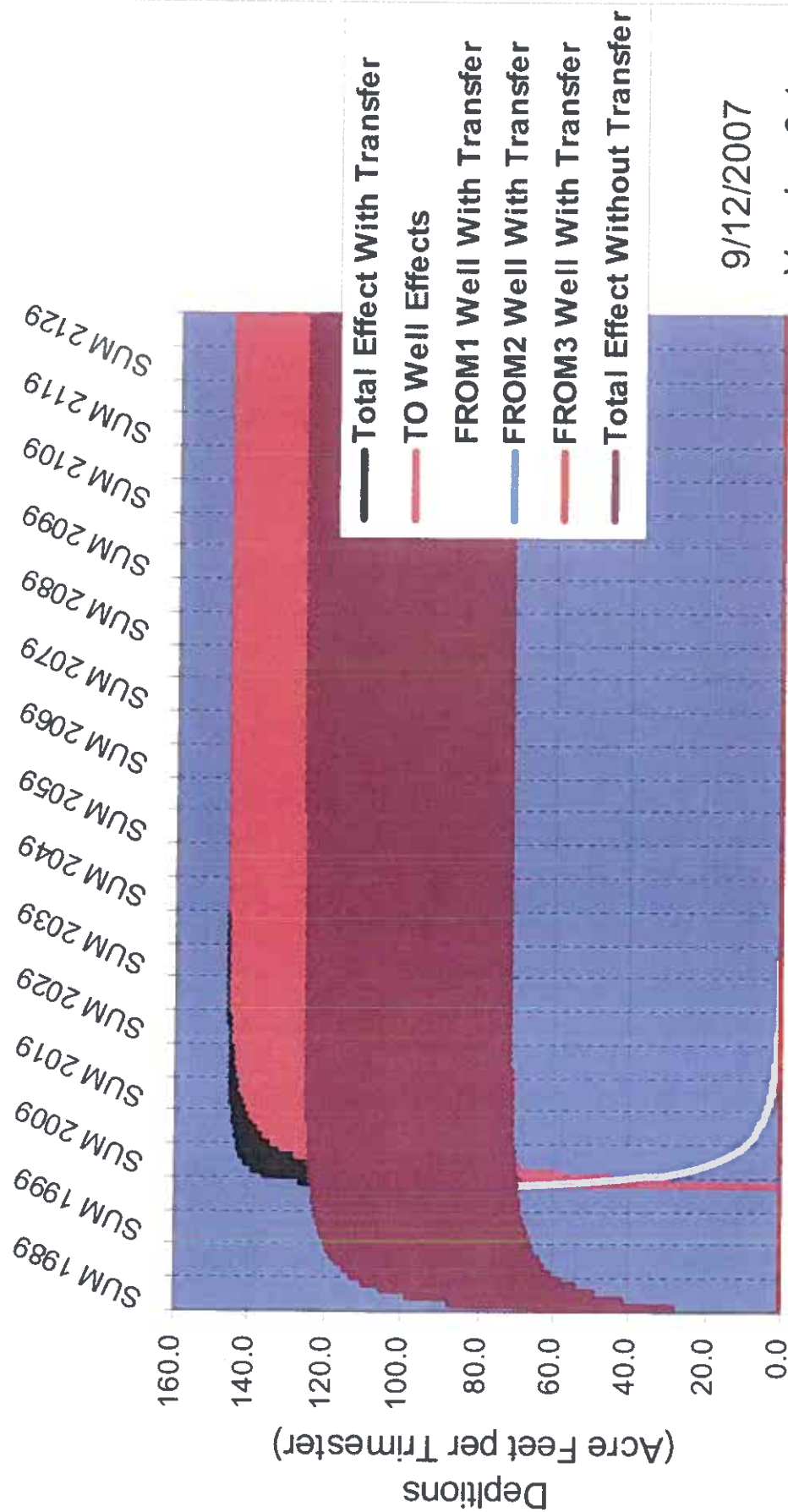
9/12/2007

Version 3.1

WITHOUT MITIGATION

Hydrologic Response--Shelley to Near Blackfoot

Customer Name: Comore Transfer No: new



9/12/2007

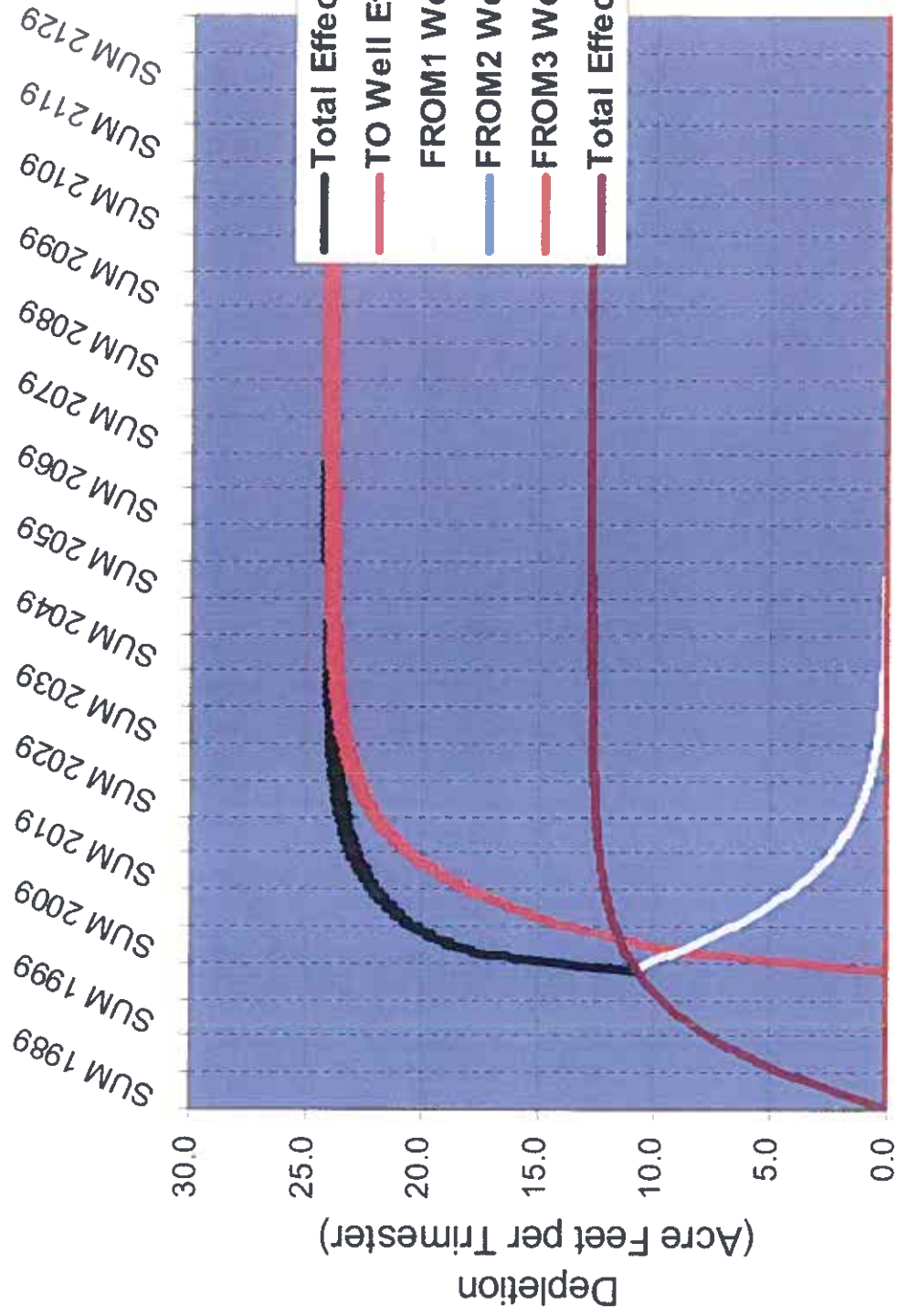
Version 3.1

WITHOUT MITIGATION

Hydrologic Response--Ashton to Rexburg

Customer Name: Comore

Transfer No: new



9/12/2007
Version 3.1

WITHOUT MITIGATION

ESPA Ground Water Rights Transfer Spreadsheet Data Summary

TRANSFER NO: new
TRANSFER NAME: Cornore

PREPARED BY: JP
DATE: 9/12/2007
Transfer Tool Version Version 3.1

BLUE CELLS ARE SET UP FOR
USER ENTRIES

WATER RIGHTS INVOLVED:

Group 1 Transfer Rights		Group 2 Additional Mitigation Rights	
Right No.	Priority Date	Right No.	Priority Date
35-13624	6/1/1989		

HISTORIC BENEFICIAL USE:

Trans/Mit Rights (group no.)	Acres to Dry Up (ac)	Beneficial Use (af/yr)	Total (af/yr)
35-13624	238.4		953.6

MITIGATION NOTES:

with mitigation
other notes - TO well is in 4 adjacent
cells, used one cell to simplify

MODEL CELL LOCATIONS:

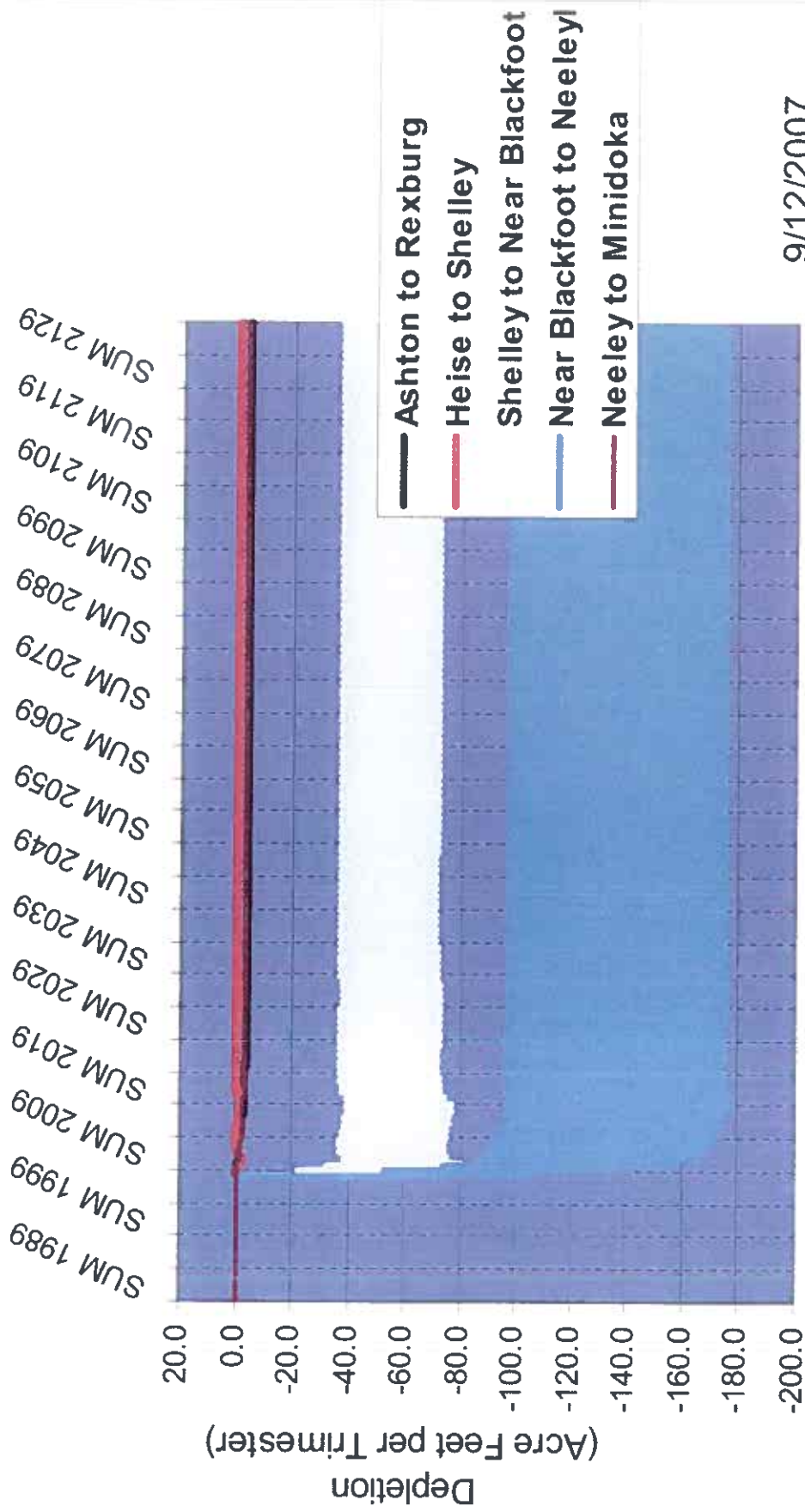
	TO WELL	FROM1 WELL	FROM2 WELL	FROM3 WELL
ROW	79	70	0	0
COLUMN	164	137	0	0

	Start Date		End Date		Water Use		Acres Authorized (acres)	Notes
	Season	Year	Season	Year	Annual (af/yr)	Trimester (af/trimester)		
TO Well (Projected Use)	summer	2006	summer	2010	150.0	150.0	238.4	use summer trimester to simplify
	summer	2011	summer	2019	300.0	300.0	238.4	
	summer	2020	summer	2037	345.0	345.0	238.4	
	summer	2038	summer	2138	354.0	354.0	238.4	
FROM1 Well (With Transfer)	summer	1989	summer	2007	953.6	953.6	238.4	use summer trimester to simplify
FROM1 Well (Without Transfer)	summer	1989	summer	2138	953.6	953.6	238.4	use summer trimester to simplify
FROM2 Well (With Transfer)								
FROM2 Well (Without Transfer)								
FROM3 Well (With Transfer)								
FROM3 Well (Without Transfer)								

WITH MITIGATION

NEW

Net Transfer Effect Above Milner **(Total Effect With Transfer - Total Effect Without Transfer)**



9/12/2007

Version 3.1

Transfer No: new

Customer Name: Comore

WITH MITIGATION