

Hydro Logic, Inc.

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August 29, 2008

Mr. Steve Lester
Water Rights Supervisor
Idaho Department of Water Resources
Western Regional Office
2735 Airport Way
Boise, ID 83705

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WATER RESOURCES
WESTERN REGION

Subject: Request for Expedited Processing of Amendment to Permit No.63-12296

Dear Steve:

An emergent situation has come up with the Idaho Department of Correction's (IDOC) Idaho State Correctional Institution's (ISCI) municipal supply Well #3. ISCI Well #3 is currently the only ISCI supply well capable of producing the facility's summertime water demand. Well #3 was drilled and completed by Jesse J. Doty using the cable-tool drilling method and thin-wall steel casing in 1966. Owing to the age of the well (42 years), and the fact that Well #3 is the lead supply well for the institution, IDOC is justifiably concerned about the possibility of catastrophic collapse of the casing. A recent underwater camera inspection of the well has revealed that the casing is severely pitted and corroded (see attached photographs).

IDOC has asked Hydro Logic, Inc. to evaluate Well #3's long-term viability and determine whether it should be repaired or replaced. Although we believe the well can and should be repaired, we do not feel at all comfortable taking the well off line for the repairs owing to the potential for the well to be damaged in the process, leaving the ISCI without its main water supply well for an extended time. We have additional concern that the full productive yield of Well #3 may not be able to be duplicated by a new well drilled in accord with modern administrative drilling rules of IDWR.

Our recommendation is for the IDOC to drill and complete a new well on the same site while maintaining Well #3 on line during construction. Only after Well #3-B is drilled, completed, tested, and equipped would Well #3 be taken off line and repaired. The proposed new Well #3-B would be drilled on the same site (within 100 feet of the existing Well #3) and connected to the existing Well #3 pump house plumbing via a pit-less adaptor. In this way, Wells #3 and #3-B would share the same existing plumbing and electrical power such that only one of the wells could be operated at a time. Furthermore, because the two wells will be in such close proximity, water level interference effects within the aquifer would prevent both wells from being pumped at the same time.

Because of the great depth to water (~500 feet below ground level) and the required total depth of wells in this hydrogeologic environment (750-to-1,000 feet), new well projects are very costly. For this reason, and because ISCI needs a back-up water source in the event of a well or pump failure anyway, we are recommending that ISCI not only develop new supply Well #3-B, but that the existing Well #3 be maintained and repaired in the future. To that end, and under cover of this letter, we transmit an Application for Amendment of Permit No. 12296 requesting to add Well #3-B as a point of diversion to all ISCI water rights listing Well #3 as a point of diversion

IDOC understands that it cannot increase the amount of its diversions as a result of the proposed amendment, and that IDWR may place conditions on the water right to that effect. IDOC is willing to configure the well head plumbing such that it would not be possible to pump both wells at the same time.

I have contacted United Water Idaho, Inc. (UWID) with respect to IDOC's new Application for Amendment of Permit and explained our objectives. As a result, UWID developed a letter to IDWR, dated July 28, 2008 (attached), stating that it has no objection to the proposed water right changes by IDOC.

To prevent what could become a crisis situation at the prison, and due to the current backlog of water right applications at IDWR, IDOC respectfully requests that IDWR consider this Application for Amendment for expedited processing.

Thank you for your consideration of this request. I stand available to answer any questions you may have or to supply any additional information IDWR deems necessary.

Sincerely,

Ed Squires

A handwritten signature in black ink, appearing to read 'Ed Squires', is positioned to the right of the typed name.

c: Pat Donaldson, Idaho Department of Corrections