State of Idaho
Department of Water Resources

RECOMMENDATION OF WATERMASTER

Application No: 73721, 73722, 73723, 73724, 73725, 73726
Water Right No: 36-8415, 36-8624, et al
Applicant Name: Jentzsch

Watermaster's Recommendation:

a) ___ I do not oppose approval of this application

b) _X_ I do not oppose approval of this application if it is conditioned as follows:

For all applications: OK as drafted
See below for additional comment

c) ___ I oppose approval of this application(s) for the following reasons:

d) _X_ Additional comment:

I am a little uncomfortable with this swap scenario where no hydrologic analysis is required simply because the same acres / volume are traded farm-to-farm. If we were to apply the priority-based analysis which was applied to recent offsetting transfer packages, we might in fact see an impact under a curtailment scenario, where early rights were transferred from north to south and would then be allowed to continue pumping in close proximity to the Snake River. The amounts being transferred N to S in this scenario are small and there might not be an impact greater than the 2AFA threshhold.

Dated: July 14, 2008

Water District 130

Cindy J Yenter, Watermaster