

Memo

To: Jeff Peppersack
From: Mike McVay 
Cc: Sean Vincent
Date: 5/20/2008
Re: Helms approach for ESPA transfers # 73715 and # 73716.

As requested, we have reviewed the approach for evaluating curtailment scenarios for the previously approved offsetting Eastern Snake Plain Aquifer (ESPA) transfers #73715 and #73716 that were submitted by Jason Helms of Thompson Engineering. The general idea is that the hydrologic impacts of one water right transfer could be offset by one or more other transfers in order that the cumulative impacts of the combined transfer satisfy Departmental guidelines for transfer approval. A concern with the offsetting transfer strategy is that, for combined transfers involving multiple water rights with different priority dates, the hydrologic impacts might satisfy the reach depletion criteria for the combined transfer but the hydrologic impacts might not satisfy the reach depletion criteria if and when some of the junior priority rights that are included in the transfer are curtailed. The analysis provided by Mr. Helms indicates that curtailments of junior priority rights involved in the combined transfer should not negatively impact the acceptability of the transfer.

In Mr. Helm's analysis, various curtailment scenarios were compared in steady-state both before and after the proposed transfers. Assuming that the numbers provided in the spreadsheet are correct, it appears that the combined transfer satisfies the depletion criteria for acceptance of the transfer as identified in Administrative Transfer Processing Memorandum No. 24, dated October 30, 2002, and in the Memorandum regarding New ESPA Transfer Spreadsheet (V2.1) - Recommendations for Implementation and Use, dated March 1, 2006. Furthermore, it appears that the combined transfers #73715 and #73716 will not create significant reach depletions under the various curtailment scenarios. As shown in Table 1, impacts do exist, but the depletions to all hydraulically connected reaches of the Snake River are less than either the 5% or 2 acre-feet/trimester criteria for approval of a transfer involving water rights on the ESPA.

In conclusion, it appears the information presented in support of this transfer is correct, and significant impacts will not occur regardless of a potential curtailment date. If you have any questions or comments regarding this review or the approach submitted by Mr. Helms, please feel free to contact me at 287-4840.