

MEMORANDUM

TO: Transfer No. 73888
FROM: Steve Lester 
DATE: June 11, 2008
RE: Transfer Approval and P/D Location

One concern noted in parallel processing of this transfer was the SO recommendation to identify P/Ds to 10-acre tracts because of transfer processing standards and possible heightened level of concern for the area in question (continued development etc.). This was discussed in a 5/2/08 email from SO to Western reviewer.

SO is correct that the license was issued with 10-acre P/D locations. However, the heightened level of concern for well drilling in this area is not evidenced by the track record so far: no protests to Sorrento Lactalis 2004 ground water application 63-32103 (approved) and no protests to this transfer application (ready to approve). Also, the applicant specifically seeks the more flexible 40-acre description for wells.

In my opinion, based on working with water rights for this site and nearby areas for many years, no compelling reason is found to require 10-acre P/D sites for this transfer application.

Transfer 73888 should be approved as noted in the draft approval.