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RECEIVED

OCT 27 2008

DEPARTMENT OF
WATER RESOURCES

October 22, 2008

Ms. Cindy Yenter
Watermaster, WD 130
IDWR
1341 Fillmore St., Ste. 200
Twin Falls, Idaho 83301-3380

RE: PLAN FOR IMPROVEMENT OF DATA ENTRY AND REPORTING

Ms. Yenter,

I received a copy of your letter to the NSGWD (North Snake Ground Water District) regarding the deficiencies of the data for the non-irrigation diversions within the district. Thank you for your prompt response and suggestions. This letter constitutes a plan for the improvement of data entry and reporting.

I personally will review all 2007 non-irrigation diversion records in the NSGWD utilizing the additional guidance you provided. This process will train me on the procedures. This review will be completed by December 20, 2008. I assume you will then review the data and compile a list of corrections for my training. I will review your list of corrections to be implemented for the 2008 data.

I will personally train employees of WWC (Water Well Consultants, Inc.) on the procedures for data entry of the 2008 data. I personally will complete all the calculations for volume of these diversions.

WWC will continue to send out summary sheets to the owners which include the volume calculations. Owners are requested to review the sheets and contact WWC if there are discrepancies. WWC will also request queries from the IDWR for additional quality assurance.

The above steps will train myself and in turn my employees on the correct procedures for data entry and reporting of data for NSGWD and other districts thus improving all records.

Thank you,

A handwritten signature in cursive script that reads "Brian Higgs P.G.".

Brian Higgs, P.G.

Cc: Tim Luke
NSGWD

(1M)



STATE OF IDAHO
WATER DISTRICT 130
C/O IDAHO DEPARTMENT OF WATER RESOURCES
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IDWR DIRECTOR
DAVID R TUTHILL, JR

WATERMASTER
CINDY YENTER
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October 20, 2008

NORTH SNAKE GROUND WATER DISTRICT
152 E MAIN ST
JEROME ID 83338

RE: Measuring and Reporting of Non-Irrigation Wells in NSGWD

Dear Board Members:

I am in receipt of letters from Brian Higgs, Water Well Consultants, dated June 19, July 7 and September 15, 2008. These letters discuss the reactions and responses of the NSGWD to my letter dated June 11, 2008, in which I described concerns about deficiencies in measurement and reporting of non-irrigation wells in NSGWD. I greatly appreciate Mr. Higgs' timely replies on behalf of the North Snake Board, and his efforts to quickly resolve these issues.

Mr. Higgs indicated he was meeting again with you tomorrow at your regular board meeting. I would like to provide a more formal response to the above letters, so that you can discuss your next steps, and Mr. Higgs can continue with his work. In particular, I would like to clarify the portions of my June 11 letter which identify criteria which will be used to determine that NSGWD is meeting all applicable measurement, reporting and data entry standards.

Page 2 of the June 11 letter contains the following criteria, intended to be applied to 2007 NSGWD WMIS database records:

- *At least 95% of active non-irrigation flow meter annual diversion records must be populated with valid totalizer data (no more than 5% incomplete or showing no data). This criterion will be calculated on primary data records only and will not include records for shared meters.*
- *No more than 5% of active non-irrigation flow meter annual diversion records must require correction after data entry. This criterion will apply to all records, including associated records for shared flow meters and for flow meter calibrations.*

Mr. Higgs correctly points out in his July 7 letter that it is too late in the year (2008) to obtain missing non-irrigation data for 2007, as required by the first criterion. Mr. Higgs also has expressed concern that the second criterion would be difficult or impossible to attain, given the amount of non-reported data, and the lack of data from inoperable or out-of-compliance flow meters. Mr. Higgs feels that NSGWD was unfairly penalized for data entry errors on those records when data were not even available.

In response to Mr. Higgs' comments, I will modify application of the above criteria, in the following manner:

Criterion #1 (completeness of data) will not be applied to 2007 data, but will instead be applied to 2008 reported data. This will allow NSGWD the opportunity to implement the measurement plan as proposed in Mr. Higgs' September 15 letter.

Criterion #2 (accuracy of data entry) will be applied to both 2007 and 2008 data, with results from both years considered. Additional data entry guidance will be provided so that existing records may be updated. For 2007, incomplete records resulting from non-reporting of data, will not be counted as errors, provided that the records are properly input and documented. My June 11 letter indicated that quality assurance checks would begin on NSGWD 2007 data after August 1, 2008. Checks on 2008 data will occur sometime after May 1, 2009.

The measurement and reporting plan Mr. Higgs outlines in his most recent letter addresses identified measurement deficiencies. This plan proposes only two on-site visits per year, but it will provide that at least end-of-year data are collected for all non-irrigation diversions for 2008. The plan will also help identify any flow meters which have failed during the year or are otherwise not in compliance. Mr. Higgs' ordinary non-irrigation flow meter calibration schedule is sufficient and is not under review at this time. The measurement plan is acceptable for 2008, and after review of 2008 data I will review the plan again.

Mr. Higgs' most recent letter did *not* include any clear strategy for continued improvement of reporting or data entry deficiencies. NSGWD must still submit a plan, similar to and complementing the measurement plan, which addresses accuracy and quality of WMIS reporting and data entry. I would expect that this plan include procedures for internal quality assurance checks and training for any persons who conduct data entry of NSGWD data.

As requested, and as referenced in both the July and September letters, I prepared a guide for Mr. Higgs and his staff to use during data entry of flow meter data. This guide is intended as an addendum to published WMIS data entry standards, and includes specific examples of data entry procedure to correct the common errors listed in my June 11 letter, including non-sequencing totalizer data, missing or non-reported data, broken flow meters, and missing multipliers and volume units. The goal of the guide is to create consistency in data entry and provide clear protocol for non-standard data entry scenarios.

At minimum, all 2007 NSGWD non-irrigation WMIS data entry should be reviewed, and modified as necessary to meet standards. All 2008 data entry will be expected to be entered correctly. Mr. Higgs has indicated to me that he was not able to meet the August 1 deadline for review of 2007 non-irrigation data. I am not certain of the status of his review at this time. The NSGWD Board should formally request an extension of the August 1 deadline, if additional time for 2007 data review is desired.

Based on Mr. Higgs' due diligence, I do not anticipate that WD130 will be required to assume measurement and reporting of NSGWD non-irrigation diversions in 2009. On the contrary, I expect that NSGWD measurement and reporting issues can and will be resolved. However, the Board's continued participation will be necessary to help keep plans on track.

Thank you for your ongoing cooperation. Please prepare and submit a reporting plan for my consideration no later than November 15, 2008. As always, calls and questions from any of the Board members are welcome.

Regards,



Cindy Yenter
Watermaster, Water District 130

cc: Tim Luke, IDWR
Brian Higgs, Water Well Consultants