



State of Idaho

## DEPARTMENT OF WATER RESOURCES

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C.L. "BUTCH" OTTER  
Governor

GARY SPACKMAN  
Director

January 22, 2018

DARREN BITTER  
1344 NORTH 1900 EAST  
TERRETON, ID 83450

Re: Requests for Variance to Use Power Consumptive Coefficient (PCC) and Flowmeter Spacing  
**PRELIMINARY DENIAL to use PCC: 2 of the 11 wells submitted**  
**STATUS UPDATE on Variance Request for Flowmeter Spacing: 4 of the 11 wells submitted**

Mr. Bitter,

On September 20<sup>th</sup> 2017 the Idaho Department of Water Resources ("Department") received your requests for variances from the requirement to install an approved measuring device as required by the July 20, 2016 *"Final Order on Reconsideration in the Matter of Requiring Measuring Devices for Ground Water Diversions in Water District Nos. 31, 34, 100, 110, 120, 130 and 140"* ("Order"). The Order allows for the consideration of variance requests to use an alternate method of measuring the flow rate and annual diversion volume for simple systems from a ground water point of diversion. The deadlines described in the Order for installing an approved measuring device on diversions for the following beneficial uses are:

- Non-irrigation: January 1, 2018
- Irrigation\*: By the start of the 2018 irrigation season

\* May include other incidental uses

Reason(s) for Preliminary Denial to Use PCC (see Table 1 for summary):

- Some of these systems have operating conditions that change the flow and demand condition during the irrigation season therefore, these systems do not meet the criteria of a "simple system".
  - Some of these systems have an end gun attached and may be operating intermittently
  - Some of these systems consist of two wells that may be interconnected

Additional Information Requested for Wells: #5

- Please indicate what proportion of time the end gun is used and if there is an end gun booster.
- Please indicate whether or not the wells #5 and # 7 are interconnected. Please describe the piping system configuration for each well and all the possible ways water can be conveyed. Specifically please provide a detailed description of how the corner on Well #5 is watered.

Additional Information Requested for Well: #9

- Please indicate what proportion of time the end gun is in use and whether there is an end gun booster present.

Table 1: Preliminary Denial Summary

| Well Name | IDWR WMIS Number | Metal Tag Number | Variance Tracking Number | Reason for Preliminary Denial                                                                                                                               |
|-----------|------------------|------------------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5         | 300640           | A0008262         | 2017-336                 | More information about proportion of time end gun is used and pipe system. How is the corner watered? Is this well interconnected with the adjacent well 7? |
| 9         | 300637           | A0001858         | 2017-338                 | What proportion of time is the end gun on? Is there an endgun booster?                                                                                      |

Status Update for Variance of Flowmeter Spacing:

- The four (4) variance requests to allow flow meter installation at less than the IDWR required minimum spacing are still under review.

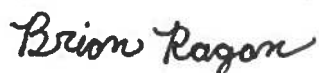
Table 2. Variance Request Summary for Flowmeter Spacing

| Well Name           | IDWR WMIS Number | Metal Tag Number | Variance Tracking Number |
|---------------------|------------------|------------------|--------------------------|
| 100                 | 300089           | A0001859         | 2017-337                 |
| DO Place-North Pump | 300129           | A0005892         | 2017-343                 |
| DO Place-South Pump | 300130           | A0008673         | 2017-342                 |
| North Well          | 300088           | A0005838         | 2017-334                 |

At this time the Department will place your variance request on hold until you have had the opportunity to review this letter. The Department would like to make you aware that while your variance request is on hold you are not guaranteed protection from possible enforcement action if you have not received an approved variance or installed an approved measuring device prior to the 2018 deadline.

Please call or email me within 14 days of receipt of this letter to discuss this letter and the specifics of your irrigation system.

Sincerely,

A handwritten signature in black ink that reads "Brian Ragan". The signature is written in a cursive, flowing style.

Brian W. Ragan  
Water Distribution Section  
Email: [brian.ragan@idwr.idaho.gov](mailto:brian.ragan@idwr.idaho.gov)

cc. James Cefalo, Water District 110 Watermaster  
File

SEP 20 2017

DEPARTMENT OF  
WATER RESOURCES

# REQUEST FOR VARIANCE OF IDWR APPROVED FLOW METER REQUIREMENT

Please fill out one form for each affected well

A variance will only be considered or approved for simple systems, open discharge wells, or for non- approved flow meters installed prior to the date of an IDWR measurement order.

Please note: this request must be approved before you may use any alternate measurement method.

Owner/Operator: Sullivan Limited Partnership  
 Well Name: #9  
 IDWR Site Tag No.: 40001858  
 Legal Description: 9N 34E 6NW NESW  
 Water District: 110  
 Reporting District: Jefferson/Clark  
 (ground water district, irrigation district or other entity)

Select the method of measurement you wish to use and have approved:

- ☒ Power Consumption Coefficient (PCC) (only for irrigation diversions that consist of one well and one irrigation discharge point or one distinct flow and demand condition)
- ☐ Hour Meter / Time Clock (one well, open discharge)
- ☐ Existing operating flow meter (installed prior to the date of the effective order, and determined as acceptable by the Department)
- ☐ Standard Open Channel Device (one or multiple wells, open discharge, device must be read daily or flows must be continuously recorded)

If you are requesting a variance, you must answer the following questions:

- Does the well open discharge into a pond or ditch? Yes No (if YES, skip to #3)
- Is the well interconnected to other wells? Yes No
- What is the pump discharge main line size? 10 inches
- Please describe the irrigation equipment used with this well (example: center pivot with or without end gun, 1/4 mile wheel lines, solid set hand lines, etc.) Please describe number and length of hand/wheel lines. Describe system as accurately or completely as possible, including different operating conditions if any.  
no room chemigator and then dives into the ground.
  - Does your pivot(s) system operate with corner machines? Yes ✓ No
  - Does your pivot(s) operate with an end gun? ✓ Yes No  
 If a pivot has an end gun, estimate the percent time the end gun operates. % time end gun is on
  - Approximate number of acres irrigated by this well: 135 acres

Continued on next page

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5. Is there a flow meter presently installed on your well? Yes ☒ No (If NO, skip to #6)  
If yes, provide flow meter information below.  
Type: \_\_\_\_\_ (magnetic, propeller, insertable, etc.)

Manufacturer: \_\_\_\_\_

Installation date: \_\_\_\_\_

Is the meter operable?: Yes No

6. Are there multiple pumps or other electrical loads wired to the same electrical demand meter? Yes ☒ No  
(example: surface water pumps, booster pumps, pivots)

a. If yes, please describe other electrical loads: \_\_\_\_\_

b. How many are in-line pressure boosters? 0

c. Do in-line boosters always run with the well? Yes ☒ No

7. Does the system operate with a variable frequency drive? Yes ☒ No (If NO, skip to #8)  
If YES, note location: ☐ on well motor ☐ on booster motor ☐ on both

8. Does the well supply water for use other than irrigation? (Example: stock water, commercial)

Yes ☒ No If yes, please list uses: \_\_\_\_\_

9. Does the well production decrease over the irrigation season? Yes No

Does pumping water level decrease over the irrigation season? Yes No

If yes, approximately how many feet does the water level decrease? \_\_\_\_\_ feet

If you answered YES to any of the questions #6 through #9, your system is not likely a candidate for the Power Consumption Coefficient (PCC) method of measurement. You will be required to install a flow meter.

If the system is an OPEN DISCHARGE system (answer to #1 is YES) and well production does not decrease during the irrigation season (answer to #9 is NO), then the system may be a candidate to use an hour meter for measurement.

**Required for all systems:** Please attach a diagram or photo of the wellhead and pumping plant. Include or show locations of all proposed or existing flow meters, and the locations of boosters, valves, elbows, chemigation ports, etc., and the spacing between each.

PLEASE PROVIDE YOUR SIGNATURE AND CONTACT INFORMATION, AND RETURN ALL FORMS TO:

IDWR WATER DISTRIBUTION SECTION  
PO BOX 83720  
BOISE ID 83720-0098

Name/Title Daren Bitts / Manager

Phone Number 317-6080

Date 9/1/17

Mailing Address 1344 N 1900 E.

E-mail Address \_\_\_\_\_

Territon, ID 83450



#9