

STATE OF IDAHO
DEPARTMENT OF WATER RESOURCES

RECEIVED

MAR 04 2024

WATER SUPPLY BANK RENTAL AGREEMENT No. 823

DEPT. OF WATER RESOURCES

This is to certify that:

COUNTY LINE FARMS
PO BOX 360
AMERICAN FALLS, ID 83211

filed an application to rent water from the Water Supply Bank ("Bank"). The Idaho Water Resource Board ("Board"), being authorized to operate a Bank and to contract by and through the Director of the Idaho Department of Water Resources ("Director, Department") for rental of water from the Bank, agrees to rent water as follows:

Summary of Water Rights or Portions Rented from the Bank

Water Right No.	Priority Date	Source	Diversion Rate (CFS)	Diversion Volume (AF)	Acres (AC)	Rate Per Acre (CFS/AC)	Volume Per Acre (AF/AC)
29-2395	2/28/1958	GROUND WATER	1.65	672	168.0	0.010	4.00
35-2924	7/21/1965	GROUND WATER	0.50	108	27.0	0.019	4.00
Combined Rental Totals			2.15	780	195.0	0.011	4.00

Term of Rental: This rental agreement shall take effect when all parties have signed it and shall continue in effect until December 31, 2024. Use of rental water shall be authorized as of either the date this rental agreement takes effect or the first day of the rental season of use, in 2024, whichever occurs last.

Annual Rental Fee:

2024: \$17,940.00

The full fee for the rental of the above-described right(s) is \$17,940.00 for 2024. The rental fee includes an administrative fee of \$1,794.00 for 2024.

An annual payment shall be received by the Department on or before December 31 each year preceding the use of the rented water rights. The agreement will be void if payment is not received by the due date in a given year. Rental fees are non-refundable. To voluntarily terminate the agreement early, notify the Department in writing prior to the rental fee due date.

Detailed water right conditions are attached.

STATE OF IDAHO
DEPARTMENT OF WATER RESOURCES

WATER SUPPLY BANK RENTAL AGREEMENT No. 823

The undersigned renter agrees to use the water rented under this agreement in accordance with the Water Supply Bank rules and in compliance with the limitations and conditions of use described in this agreement:

Monty Funk
Signature of Renter

02-27-2024
Date

Monty Funk
Printed Name

owner / partner
Title

*Title required if signing on behalf of a company or organization or with power of attorney

Having determined that this agreement satisfied the provisions of Idaho Code § 42-1763 and IDAPA 37.02.03.030 (Water Supply Bank Rule 30), for the rental and use of water under the terms and condition herein provided, and none other, I hereby execute this Rental Agreement on behalf of the Idaho Water Resource Board.

By Brian Patton
BRIAN PATTON, Acting Administrator
Idaho Water Resource Board

Date 3/14/24

Rental approved by IDWR TP

Date 3/14/24

STATE OF IDAHO
DEPARTMENT OF WATER RESOURCES

WATER SUPPLY BANK RENTAL AGREEMENT No. 823

WATER USE DETAILS

LOCATION OF POINT(S) OF DIVERSION

GROUND WATER SWNW Sec. 20, Twp 06S, Rge 29E, POWER County

BENEFICIAL USE
IRRIGATION

DIVERSION RATE
2.15 CFS

VOLUME
780 AF

SEASON OF USE

Water Right No.	From	To
29-2395	4/1	10/31
35-2924	4/1	10/31

RENTERS PLACE OF USE: IRRIGATION

Twp	Rng	Sec	NE				NW				SW				SE				Totals
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	
06S	29E	20		32.0	31.0		34.0	32.0	32.0	34.0									195.0

Total Acres: 195.0

RENTAL AGREEMENT CONDITIONS OF ACCEPTANCE

1. The use of water under this agreement shall be subject to the provisions of Idaho Code § 42-1766.
2. Rental of the specified right from the bank does not, in itself, confirm the validity of the right or any elements of the water right, or improve the status of the right including the notion of resumption of use. It does not preclude the opportunity for review of the validity of this water right in any other department application process.
3. Use of water under this agreement does not constitute a dedication of the water to renter's place of use, and upon expiration of this agreement, the points of diversion and place of use of the water shall revert to those authorized under the water right and/or again be available to rent from the bank.
4. Use of water under this agreement shall not prejudice any action of the Department in its consideration of an application for transfer or permit filed by the applicant for this same use.
5. Renter agrees to comply with all applicable state and federal laws while using water under this agreement.
6. Renter agrees to hold the Board, the Director and the state of Idaho harmless from all liability on account of negligent acts of the renter while using water.
7. Renter acknowledges and agrees that the Director may terminate authorization for the use of a water right based on a water right's priority date.
8. Failure of the renter to comply with the conditions of this agreement is cause for the Director to rescind approval of the rental agreement.
9. This right when combined with all other rights shall provide no more than 0.02 cfs per acre nor more than 4.0 afa per acre at the field headgate for irrigation of the place of use.
10. After specific notification by the Department, the right holder shall install a suitable measuring device or shall enter into an agreement with the Department to use power records to determine the amount of water diverted and shall annually report the information to the Department. Use of water under this right may be

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DEPARTMENT OF WATER RESOURCES

WATER SUPPLY BANK RENTAL AGREEMENT No. 823

regulated by a watermaster with responsibility for the distribution of water among appropriators within a water district. At the time of this approval, this water right is within State Water District No. 120.

11. This rental agreement does not authorize the construction of a well.
12. Rental of rights 29-2395 and 35-2924 when combined shall not exceed a total diversion rate of 2.15 cfs, a total annual maximum diversion volume of 780 af at the field headgate, and the irrigation of 195 acres.
13. Prior to December 31 of each year, the Board may review this rental agreement to determine whether it is consistent with the management plan that may be approved for the Eastern Snake Plain Aquifer Ground Water Management Area ("ESPA GWMA Plan") pursuant to Idaho Code § 42-233b. The Board may cancel this rental agreement if the Board determines it is not consistent with the ESPA GWMA plan. If this rental agreement is canceled, the cancellation shall not take effect until December 31 of the year in which the rental agreement is canceled.

Idaho Water Resource Board

Attachment to Water Supply Bank Rental Agreement No. 823

Effective until December 31, 2024

This map depicts the **IRRIGATION rental place of use** pursuant to the rental agreement and is attached to the agreement solely for illustrative purposes.



Legend

-  Water Supply Bank Rental POD
-  Water Supply Bank Rental POU
-  Township/Range
-  Sections
-  QQ



0 0.15 0.3 Miles

STATE OF IDAHO
WATER RESOURCE BOARD

**APPLICATION TO RENT WATER
FROM THE BOARD'S WATER SUPPLY BANK**

RECEIVED

OCT 20 2023

DEPARTMENT OF
WATER RESOURCESApplicant Name: County Line Farms

Is this application being submitted with a lease application as a lease/rental package?

Yes ☒ No ☐

If yes, specify companion water rights in Section 4

This application must be completed according to the minimum requirement checklist below. This checklist is part of the rental application and must be included with the rental application. **Applications that do not meet the minimum requirements will not be placed in the processing queue and may be returned until all minimum requirements have been met.**

Rental applications should be submitted well in advance of the desired start date for the use of rental water. Rental applications may be processed as early as November 1 of the year prior to the intended use of rental water. Any rental application received on or before November 1 for use in the next year will be assigned a received date of November 1. Rental applications submitted more than one year in advance of the proposed start date for the use of rental water will not be accepted and will be returned to applicants. Rental applications may be returned to applicants if the desired start date for the use of rental water cannot be accommodated by the Water Supply Bank. Rental requests will not be accepted once the rental season of use period has concluded.

One rental application per beneficial use of water. For multiple beneficial uses of water, separate rental requests should be submitted for each unique beneficial use of water. One rental application can be submitted if you propose to rent water from multiple sources.

For additional instructions on completing a rental application, visit the Bank's website at http://idwr.idaho.gov/water_supply_bank.

MINIMUM REQUIREMENT CHECKLIST

Check All Items as Either Attached (Yes) or Not Applicable (N/A)

Yes

- ☒ Completed *Application to Rent Water from the Board's Water Supply Bank*
- ☒ Confirmation that this form has been printed single sided, per requirement of the Water Supply Bank

Attachment N/A Yes

- | | | |
|----|--|--|
| 2 | ☒ | A map showing the proposed point(s) of diversion, place(s) of use, and water diversion and distribution systems proposed to be used with your rental request |
| 3A | ☒ ☐ | Detailed information on a proposed use of rental water |
| 3F | ☒ ☐ | Authorization from the owner/operator of the rental point(s) of diversion |
| 3H | ☐ ☒ | Water modeling to account for the impacts of the rental request |
| 3J | ☒ ☐ | Documents justifying a rate of flow greater than 0.02 cfs/acre |
| 3K | ☒ ☐ | Authorization from the owner/operator of the property at the proposed rental place(s) of use |
| 4B | ☒ ☐ | Explanation of how the rental water will sufficiently accomplish your rental purposes |
| 4C | ☒ ☐ | Explanation of consumptive use amounts for water rights experiencing a change in nature of use |

Department Use Only – Proposed Water Right(s)

35-2395

2785

STATE OF IDAHO
WATER RESOURCE BOARD

Application to Rent Water (Continued)

1. CONTACT INFORMATION

A. Applicant County Line Farms

Mailing Address P.O. Box 360 American Falls ID 83211
Street City State Zip Code
Email Address _____ Phone Number (208) 226-5207

B. Is this application being completed by an authorized representative on behalf of the applicant? Yes ☒ No ☐
If yes, representatives (includes company employees if the applicant is a corporation, as well as legal counsel or consultants) should provide their information below if they desire to be included on correspondence with the rental applicant.

Representative Jason C. Helms, P.E. Professional Title _____
Organization JCH Civil, LLC Relationship to Applicant Consultant
Mailing Address 3158 NE Follett St
Email Address jasoncivil@alumni.nd.edu Phone Number (208) 308-2109

2. MAP

Create a map of the proposed point(s) of diversion, place(s) of use and water diversion, delivery and distribution systems. Make sure the rental place of use is outlined and annotated with legal land descriptions (Township, Range, Section and Quarter-Quarters) or with GPS coordinates. For irrigation purposes, mark the number of acres you desire to irrigate. Attach the map to this application and label it **Attachment 2**.

3. DESCRIPTION OF PROPOSED USE FOR RENTAL WATER

A. Describe why you desire to rent water and provide a detailed description of your proposed use. If the proposed use is not for irrigation, describe in detail how you determined the amount of rental water required. If the space below is insufficient, attach additional sheets as required and label them **Attachment 3A**:

This application seeks to replace the current approved rental contract #752 with the attached new lease of 29-2395 for 2024 so as not to impede this portion of 35-14041 being released from the bank in the event protests associated with pending transfer 35-14041 are resolved.

B. Enter the desired and/or minimum rates of flow, volume, or irrigable acres requested for your rental purposes:

Desired Rate (Cubic Feet/Second)	Desired Volume (Acre-Foot)	Minimum Rate* (Cubic Feet/Second)	Minimum Volume* (Acre-Foot)	Desired Acres (if applicable)
1.91 CFS	780.0 AF	1.91 CFS	780.0 AF	195.0 AC

* Sometimes water rights provide an exceptionally low rate per acre and/or low volume per acre. This section is meant to establish an acceptable range of water sufficient for your proposed water use. Please see question 4B and complete if necessary.

C. This section must be completed in full. Enter the proposed start date and latest possible start date for using rental water as well as the number of years you would like to rent water. The latest possible start is the latest possible date by which you would be willing to pay for a rental and be able to benefit from utilizing rental water.

Desired Start Date (month/day/year)	Latest Possible Start Date (month/day/year)	*Mark Desired Rental Duration (Calendar Years)					**Applicant's preference if rental application cannot be processed prior to the latest possible start?	
04/01/2024	06/01/2024	☐ 1	☐ 2	☐ 3	☐ 4	☒ 5	☒ Process application as soon as possible	☐ Return application to applicant

* The number of years permissible for a rental is subject to the lease contract duration for the water right(s) being rented.

** Per Idaho Code 42-201, it is unlawful to divert or use water without a valid water right. Water Supply Bank rental applicants are not authorized to utilize rental water prior to the execution of an approved rental agreement. Rental requests may be returned to applicants if no water is available from the Bank to fulfill a rental request.

STATE OF IDAHO
WATER RESOURCE BOARD

Application to Rent Water (Continued)

- D. Describe your water distribution system and how rental water will be delivered from the point(s) of diversion (POD) to the proposed place of use (POU):
Existing well, main, and center pivot system

- E. Describe the physical type (pump, headgate, etc.) and location of the POD from which rental water is proposed to be diverted:

POD Description	Water Source	Other Water Rights Diverted from this POD
WMIS ID 1002420	Ground Water	35-13811, 35-13812, 35-13813, 35-14418

If the POD(s) above are located where water is turned into a canal, lateral or ditch, or if they are located on your property but are serviced by water that is delivered via a canal, lateral or ditch, your rental request must include documented authorization from all relevant canal companies, irrigation districts and/or water delivery entities, confirming that they consent to your diversion of water from their system.

- F. Has documented consent from all relevant water delivery entities been obtained? Yes ☐ N/A ☒
If yes, include documented consent as **Attachment 3F**.

- G. Do any POD(s) identified in Question 3E divert from a water source that may require water modeling? Yes ☒ No ☐
Refer to the Water Modeling Requirements Information Sheet to determine if a rental POD may require water modeling.

- H. Has water modeling been provided with your rental request? Yes ☒ N/A ☐
If yes, label modeling Attachment 3 H.
Rental applications that require modeling will be returned if modeling is not provided.

- I. Specify the desired beneficial use of water and the requested season of use or number of acres required:

- ☒ Irrigation 195.0 (number of acres) Duration: Subject to IDWR standard seasons of use
- ☐ Commercial from: _____ (mm/dd) to: _____ (mm/dd)
- ☐ Stockwater from: _____ (mm/dd) to: _____ (mm/dd)
- ☐ Industrial from: _____ (mm/dd) to: _____ (mm/dd)
- ☐ Other: _____ from: _____ (mm/dd) to: _____ (mm/dd)

- J. For irrigation uses, do you propose to divert water at a rate greater than 0.02 cfs/acre? N/A ☐ Yes ☐ No ☒
If yes, justify the rate of flow and attach any supporting documents as **Attachment 3J**. Justification may include information on soil composition, conveyance losses, crop type, irrigation systems, public access areas, etc. A rate of 0.03 cfs/acre is permissible for irrigation of 5 acres or less.

- K. Do you own the land at the proposed rental place of use (POU)? Yes ☒ No ☐
If no, attach documentation from the POU owner/operator confirming your authorization to use the POU and label it **Attachment 3K**.

- L. List all other water rights and sources of water at the rental place of use for the same purpose, including privately owned water rights and water received from a municipal supplier, an irrigation district, a canal company or any other water delivery entity. Explain why additional water is required:
none

STATE OF IDAHO
WATER RESOURCE BOARD

Application to Rent Water (Continued)

4. RENTAL REQUESTS FOR SPECIFIC WATER RIGHTS

A. Are you requesting to rent specific water rights?

Yes ☒ No ☐

If yes, specify below the elements of the water rights you are requesting to rent. If no, continue to Question 4B.

Important Information: Diversion rates and volumes sought for rent must be proportionate to the per acre diversion rates and per acre volume limits of the water right under lease contract to the Water Supply Bank. Prior to completing this section, applicants should review all water right lease contracts and any active rental agreements to determine which elements of a water right are available to satisfy a rental request. Lease and rental documents are searchable via [IDWR's website](#).

Water rights identified below must either already be leased to the Bank or a lease proposal should accompany this rental request. **Rental requests for water rights not yet leased to the Bank will be returned if companion lease applications are not provided with the rental request.** For leased rights featuring combined limits, rentals must be consistent with combined diversion rate, volume or acre limits. Combined limits should be listed on a row below water right numbers.

Water Right Elements Leased to Water Supply Bank					Leased totals, minus water right elements involved in active rental agreements, equals water right elements available for rent	Water Supply Bank Rental Request		
Water Right Number (leave blank if sub-total of combined limits)	Nature of Use	Diversion Rate (CFS)	Volume (AF)	Acres (AC)		Diversion Rate (CFS)	Volume (AF)	Acres (AC)
35-2395	Irrigation	2.11	861	215.2		1.91	780.0	195.0
Applicants must ensure the requested rate per acre and volume per acre do not exceed the rate per acre and volume per acre limits of water rights leased to the Water Supply Bank					TOTAL	1.91	780.0	195.0
						CFS	AF	AC

**Attach multiple copies of this page if space above is insufficient to list all water rights requested to be rented on this application.*

B. If water right conditions, combined limits, or the sum of all water right elements being requested provide an unconventional duty of water (e.g., an unusually low rate per acre or volume per acre for irrigation use), explain how your proposed rental will sufficiently accomplish your intended purposes. Attach a separate page if space is insufficient and label it **Attachment 4B**:

C. Does your rental request propose to change the nature of use for any water right(s) being rented?

Yes ☐ No ☒

If yes, explain how the water right(s) will be converted to new uses. Include the historic, consumptive use amounts for the water right being rented if you have it, as well as the new consumptive use amount for your proposed beneficial use. If space below is insufficient, attach a separate page and label it **Attachment 4C**:

STATE OF IDAHO
WATER RESOURCE BOARD

Application to Rent Water (Continued)

5. ADDITIONAL INFORMATION

- A. Is this the first time that rental water is being requested for this purpose at the rental place of use? Yes ☐ No ☒
If no, list previous rental requests/agreements and explain why you have not secured a permanent water right for your needs:

This rental seeks to replace existing rental contract #752 with rental of 29-2395. Permanent water right transfers are difficult to arrange but is still being sought.

- B. Have you or do you intend to submit an application for permit or transfer proposing a similar use as this rental? Yes ☐ No ☒
If yes, describe:

- C. Was this rental application submitted in response to a Notice of Violation (NOV) or a pending NOV? Yes ☐ No ☒
If yes, describe the date and location of the NOV.

- D. Additional Information

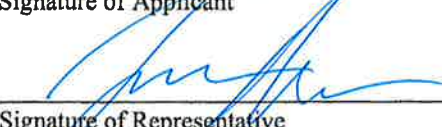
DECLARATION

I hereby assert that the information contained in this application is true to the best of my knowledge. I understand that any willful misrepresentations made in this application may result in rejection of the application or cancellation of an approval. I understand that if this rental application is approved, it will be subject to the provisions of Section 42-1766, Idaho Code and all applicable state and federal laws. I understand that the submission of a rental application provides no guarantee for approval of a rental agreement. I also understand that, per Idaho Code 42-201, it is unlawful to divert or use water without a valid water right and that I am not authorized to utilize water as proposed in this application prior to the execution of an approved rental agreement.


Signature of Applicant

Courtesy Line Farms
Printed Name of Applicant

08-01-2023
Date


Signature of Representative

JASON C. HELMS
Printed Name of Representative

9/11/2023
Date

Mail to:

Idaho Department of Water Resources
P.O. Box 83720
Boise, ID 83720-0098

Idaho Water Resource Board

Attachment to Water Supply Bank Rental Agreement No.

Effective until December 31, 2027

This map depicts the **IRRIGATION rental place of use** pursuant to the rental agreement and is attached to the agreement solely for illustrative purposes.



Legend

-  Authorized Rental Place of Use
-  Authorized Rental Point of Division
-  Township/Range
-  Sections
-  QQ



0 0.125 0.25 Miles

Cells this color are
set up for user entries

ENTER STARTING DATE FOR

SIMULATION. THEN PUSH

"UPDATE DATES" BUTTON

YEAR

1952

SEASON

TRANSFER NO:

County Line Farms

TRANSFER NAME:

2024 Rental 29-2395

Change to
29-2395

2/28/1958

780.00 afa

Current Rental #752

35-14041

10/16/1974

780.00 afa.

ENTER CELL LOCATIONS:

	'TO' CELL	'FROM1' CELL	'FROM2' CELL	'FROM3' CELL
ROW	82	97	66	
COLUMN	93	124	128	

6S29E-20SWNW		29-2395		35-14041			
TRIMESTER OF ACTIVITY	TO WELL Projected Use AF/TRIMESTER	FROM1 WELL		FROM2 WELL		FROM3 WELL	
		With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER
SPR 1952	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SUM 1952	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIN 1952	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPR 1953	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIN 1957	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPR 1958	0.00	195.00	195.00	0.00	0.00	0.00	0.00
SUM 1958	0.00	195.00	195.00	0.00	0.00	0.00	0.00
SPR 1974	0.00	195.00	195.00	0.00	0.00	0.00	0.00
SUM 1974	0.00	195.00	195.00	0.00	0.00	0.00	0.00
WIN 1974	0.00	195.00	195.00	0.00	0.00	0.00	0.00
SPR 1975	0.00	195.00	195.00	195.00	195.00	0.00	0.00
SUM 1975	0.00	195.00	195.00	195.00	195.00	0.00	0.00
SPR 1996	0.00	195.00	195.00	195.00	195.00	0.00	0.00
SUM 1996	0.00	195.00	195.00	195.00	195.00	0.00	0.00
WIN 1996	0.00	195.00	195.00	195.00	195.00	0.00	0.00
SPR 1997	0.00	29-2395 CRP/CREP 1997- 2012	0.00	195.00	195.00	0.00	0.00
SPR 2006	0.00		0.00	195.00	195.00	0.00	0.00
SUM 2006	0.00		0.00	195.00	195.00	0.00	0.00
WIN 2006	0.00		0.00	195.00	195.00	0.00	0.00
SPR 2007	0.00		0.00	195.00	195.00	0.00	0.00
WIN 2012	0.00		0.00	195.00	195.00	0.00	0.00
SPR 2013	0.00	Waterbank 2013- present	195.00	195.00	0.00	195.00	0.00
SUM 2013	0.00		195.00	195.00	0.00	195.00	0.00
WIN 2013	0.00		195.00	195.00	0.00	195.00	0.00
SPR 2014	0.00		195.00	195.00	0.00	195.00	0.00
SPR 2022	0.00		195.00	195.00	0.00	195.00	0.00
SUM 2022	0.00		195.00	195.00	0.00	195.00	0.00
WIN 2022	0.00		195.00	195.00	0.00	195.00	0.00
SPR 2023	14041 Rented at TO Well 2023	195.00	Fraction unrented in 2023	154.00	195.00	0.00	195.00
SUM 2023		195.00		154.00	195.00	0.00	195.00
WIN 2023		195.00		154.00	195.00	0.00	195.00
SPR 2024	Request swap to 29-2395 Rental at TO Well 2024	195.00	29-2395 Rented 2024	0.00	195.00	35-14041 CRP/CREP 2007- 2022	195.00
SUM 2024		195.00		0.00	195.00		195.00
WIN 2024		195.00		0.00	195.00		195.00
SPR 2025		0.00	195.00	195.00	195.00	0.00	195.00
SUM 2025		0.00	195.00	195.00	195.00	0.00	195.00
WIN 2025		0.00	195.00	195.00	195.00	0.00	195.00
SPR 2026		0.00	195.00	195.00	195.00	0.00	195.00
SUM 2026		0.00	195.00	195.00	195.00	0.00	195.00
WIN 2026		0.00	195.00	195.00	195.00	0.00	195.00
SPR 2027		0.00	195.00	195.00	195.00	0.00	195.00
WIN 2100		0.00	195.00	195.00	195.00	0.00	195.00
SPR 2101		0.00	195.00	195.00	195.00	0.00	195.00
SUM 2101		0.00	195.00	195.00	195.00	0.00	195.00
WIN 2101		0.00	195.00	195.00	195.00	0.00	195.00

One-Way Analysis of Independent Transfers

Water Supply Bank Application (195 Ac Replacement of 35-14041 with 29-2395):

WR No.	Div. Rate	Con. Vol.	No. of Irr.	Priority	POD	Dedicated Vol.	Model
(CFS)	(AFA)	(AFA)	Acres	Date	Location	AFA/ AFT	Node

Transfer 1: Proposed Steady State Impacts following Transfer

This shows impacts if existing rental of 35-14041 is replaced with new rental of 29-2395

Transfer 1: Worst Case Transient State Impacts following Transfer

Impact by Reach (AF/Trimester)

Ashton to Rexburg	Heise to Shelley	Shelley to Nr Bickft	Nr Bickft To Neeley	Neeley to Minidoka	Dev. Wbl. To Buhl	Buhl to Kspr	Kspr	Kspr to Malad	Malad	Malad to Bancroft
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5.39	8.99	46.32	319.92	2.27	2.34	1.90	0.86	0.81	0.92	0.12
5.38	8.98	46.31	319.89	2.27	2.33	1.89	0.86	0.81	0.92	0.12
5.39	8.99	46.32	319.92	2.27	2.34	1.90	0.86	0.81	0.92	0.12
5.38	8.98	46.31	319.89	3.49	2.33	1.89	0.86	0.81	0.92	0.12

Steady State Analysis	Mitigation Check 1 - >10% of Historical:	-0.2%	-0.1%	0.0%	0.0%	-0.1%	-0.3%	-0.3%	-0.3%	-0.3%	-0.3%
	Mitigation Check 2: > 2 AF/T:	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Mitigation Check 3 - >10% of Total:	1.4%	2.3%	11.9%	82.1%	0.6%	0.6%	0.5%	0.2%	0.2%	0.0%
	Mitigation Required?:	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO
	Mitigation Vol. Req'd (ac-ft):	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Transient State Analysis	Mitigation Check 1 - >10% of Historical:	-0.2%	-0.1%	0.0%	0.0%	53.5%	-0.3%	-0.3%	-0.3%	-0.3%	-0.3%
	Mitigation Check 2: > 2.01 AF/T:	0.0	0.0	0.0	0.0	1.2	0.0	0.0	0.0	0.0	0.0
	Mitigation Required?:	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO
	Mitigation Vol. Req'd (ac-ft):	0.0	0.0	0.0	0.0	1.2	0.0	0.0	0.0	0.0	0.0

Read Me

ESPA Impacts Mitigation Analysis Worksheet



IDAHO DEPARTMENT OF
WATER RESOURCES

322 E Front Street, Suite 648, Boise ID 83702 • PO Box 83720, Boise ID 83720-0098
Phone: 208-287-4800 • Fax: 208-287-6700 • Email: idwrinfo@idwr.idaho.gov • Website: idwr.idaho.gov

Governor Brad Little

Director Mathew Weaver

March 18, 2024

COUNTY LINE FARMS
PO BOX 360
AMERICAN FALLS, ID 83211

**RE: RENTAL OF WATER FROM THE WATER SUPPLY BANK
WATER RIGHT NO(S). 29-2395 & 35-2924, AGREEMENT 823**

Dear Renter:

Please find enclosed a receipt in the amount of **\$17,940.00** and a copy of a fully executed Water Supply Bank Rental Agreement in connection with the rental of 780.0 acre-feet of water for irrigation of 195.0 acres during 2024. Upon receipt of this fully executed agreement, you are authorized to divert water in compliance with the conditions of water use described in the agreement.

Pursuant to the Water Supply Bank Rules, 90% or \$16,146.00 of the rental fee will be paid to the lessor(s) and 10% or \$1,794.00 will be retained by the Department to offset administrative costs.

Sincerely,

for
Water Supply Bank

Enclosures: Receipt No. C117881
Rental Agreement (copy)

c: Sascha Marston – Fiscal
IDWR Eastern Regional Office
Representative
Water District
Ground Water District

Mansfield, Debra

From: Mansfield, Debra
Sent: Friday, March 15, 2024 10:36 AM
To: Cefalo, James; jasoncivil@alumni.nd.edu; americanfalls.aberdeen.gwd@gmail.com; Jordan, Blake; IdwrPayable
Cc: Bank
Subject: Executed WSB Rental 823
Attachments: Executed WSB Rental Agreement 823.pdf

Good Morning,

Please see the attached copy of executed Rental Agreement 823, in the name of County Line Farms, for your records.

Thank you,

Debra Mansfield | Technical Records Specialist 1
IDWR – State Office
322 E Front St, Boise ID 83702-7371
(208) 287-4921 | Debra.Mansfield@idwr.idaho.gov

MEMORANDUM FOR AGREEMENT #823

To: Water Right(s) 29-2395, 35-2924

From: Mackenzie Kienholz

Date: 2/9/2024

Re: Review & Analysis of Application to Rent Water from the State Water Supply Bank

PURPOSE/NARRATIVE: Rental Application #285 was submitted by Jason C. Helms (JCH Civil, LLC) on behalf of County Line Farms and was received by the Department on 10/20/2023. The application proposes to replace active Rental Agreement #752 (2023-2027) which rents 195 acres from right 35-14041 for irrigation. This application proposed to use right 29-2395 for the irrigation of 195 acres instead to allow right 35-14041 to be rented in a different location and for a shorter term so that the applicant may move forward with a transfer of the right after 2024. Right 29-2395 does not pass modeling for 2024 on its own, so review staff identified right 35-2924 which, when used with 29-2395, does not require mitigation.

	GWMA	Water District	Ground Water District
29-2395	ESPA	120	None
35-2924	ESPA	120	Bonneville-Jefferson
Rental Application #2785	ESPA	120	Aberdeen-American Falls

AUTHORITY TO FILE: The application was signed by Monty Funk, who is listed as an authorized agent on the initial IDSOS filing for County Line Farms (1/26/2000). There have not been any additional filings since the initial IDSOS filing. The land at the proposed POU is owned by Monty Funk according to current Power County parcel data. No concerns with authority to file.

WATER RIGHT VALIDITY: Water right validity was evaluated as part of the lease reviews for 29-2395 and 35-2924 and found no concerns.

INJURY TO OTHER WATER RIGHTS: The rental application originally proposed to rent 195 acres from 29-2395, however this move did not pass ESPA ETRAN modeling for even a one-year term; the Neeley to Minidoka reach failed. The representative requested to rent water from 43-13595 and 43-13597 for mitigation, however this still did not pass modeling. Review staff identified industrial right 35-2924, which has previously had its elements defined for irrigation use. The rental requested a total of 195 acres of irrigation. As the application originally requested 29-2395, review staff used as much from this right as possible in an amount that still resulted in no need for mitigation. This rental will include 168.0 acres from 29-2395 and 27.0 acres from 35-2924. The use of these two rights, even when modeled with mitigation up to the full amounts authorized by the rights, only passed modeling for a one-year term. See modeling data entry and results below.

County Line Farms has rented right 29-2395 at the proposed rental POU previously, both on its own and with additional rights providing mitigation. Review of modeling completed for earlier rentals of 29-2395 (2016-2020), suggests that the modeling submitted had errors that fundamentally affected the results. It does not appear the 29-2395 should have been rented on its own in these amounts at any point. Additionally, Rental Agreement #280 was originally proposed for a five-year term (2019-2023), but was reduced to a two-year term because modeling would not pass for a longer term when the previous rentals were considered. In 2021 and 2022 the applicant was required to rent additional Basin 36 water rights as mitigation. In

2023 right 35-14041 was requested and used to satisfy the request as the use of 29-2395 became increasingly difficult.

Rental	Years	WRs
Agreement 80	2016-2018	29-2395
Agreement 280	2019-2020	29-2395
Agreement 497	2021-2022	29-2395, 36-16458, 36-16460
Agreement 752	2023-2027	35-14041
Application 2785	2024	29-2395

Table 1. Previous rentals for County Line Farms at the proposed POU (2016-present).

Through this review, several policy questions arose:

- How far back should modeling for the Water Supply Bank look?
- If a renter uses a distinct water right (35-14041 in this situation) for a short period of time then requests to use a right that had previously been used at the rental location (29-2395), which previous rentals should be modeled, if any?
- If additional water is rented to mitigate impacts of a rental, should that rental be included in modeling?

As the Water Supply Bank grows in popularity and renters, especially those in the ESPA, begin to rely on the Bank for their supply year after year, these questions and more will need to be addressed. At this time, there is no specific guidance to address these questions. While it is important to include previous rentals of the same right at the same place of use in similar amounts in ETRAN modeling, as the most recent rental of 29-2395 at this location was mitigated for, and a different right was used in 2023, the modeling completed for this application only considered the 2024 proposal.

There will not be a change in source, and the lease and rental locations are within the ESPA GWMA.

ENLARGEMENT OF USE: The field examination notes for 35-2924 note that it was used “for dust control, wash sand & wash gravel.” The use of water for dust control is comparable in application and consumption to irrigation. Therefore, the full amount of this right can be, and has been, rented for irrigation. The area standard of 4 af/acre was used to calculate the number of acres that can be irrigated based on the industrial volume. The total amount of water rented under the two rights will provide a duty of 0.011 cfs/acre. A duty of 0.01 cfs/acre has previously been rented under 29-2395 and was sufficient for the requested purpose. No active rights overlap the rental POU. Both rights are primary groundwater rights and will continue to be used in this manner under this rental. The season of use will be limited to that of 29-2395. No concerns with enlargement of use.

LOCAL PUBLIC INTEREST: Review staff has no information to suggest this application is inconsistent with the local public interest.

BENEFICIAL USE/CONSERVATION OF WATER RESOURCES: The rental appears consistent with the conservation of water resources in Idaho.

DEPARTMENT STAFF OR WATERMASTER COMMENTS: The location for the rental POD is subject to Water District #120. A request for comments was sent to the WD #120 watermaster, Aberdeen-American Falls GWD and IDWR Eastern Regional Office on 2/9/2024.

Etran V3.4 Run for County Line Farms 2024 Application #2785: 168 ac from 29-2395, 27 ac from 35-2924

Mitigation Analysis Period:
Timeframe:

One-Way Analysis of Independent Transfers

New Water Right (GModelo):

VR No.	Div. Rate (CFS)	Cor. Vol (AF/A)	No. of Tr. Acres	Priority Date	POD Location	Dedicated Vol AF/AFT	Model Node	Impact by Reach (AF/Trimester)												
								Ashion to Reahurst	Reahurst to Shelby	Shelby to N. Black	N. Black to Keeley	Keeley to Windoka	Dev. Well To Buhi	Buhi to Kopr	Kopr to Mans	Mans to Bannock	Bannock to			
Transfer 1: Proposed Steady State Impacts following Transfer								2.48	10.12	11.88	168.64	0.47	0.47	0.38	0.17	0.16	0.18	0.02		
777	777	275.6	68.9	1/1/1960	SS26E-3	275.6	01.9	2.48	10.12	11.88	168.65	0.47	0.47	0.38	0.17	0.16	0.19	0.02		
Transfer 1: Worst Case Transient State Impacts following Transfer								2.48	10.12	11.88	168.64	0.47	0.47	0.38	0.17	0.16	0.18	0.02		
777	777	275.6	68.9	1/1/1960	SS26E-3	275.6	01.9	2.48	10.16	13.88	176.43	2.10	0.87	0.71	0.32	0.30	0.34	0.04		
777	777	275.6	68.9	1/1/1960	SS26E-2	275.6	01.9													
Steady State Analysis								Mitigation Check 1 - > 10% of Historical	0.0%	0.0%	0.0%	0.0%	0.2%	0.4%	0.4%	0.4%	0.4%	0.5%		
								Mitigation Check 2 - > 2 AF/Tr	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0		
								Mitigation Check 3 - > 10% of Total	1.3%	5.2%	6.1%	86.5%	0.2%	0.2%	0.1%	0.1%	0.1%	0.0%		
								Mitigation Required?	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	
								Mitigation Vol. Req'd (ac-ft)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Transient State Analysis								Mitigation Check 1 - > 10% of Historical	0.2%	0.4%	16.9%	4.6%	348.5%	26.3%	56.1%	65.9%	65.6%	85.1%	77.2%	
								Mitigation Check 2 - > 2.01 AF/Tr	0.0	0.0	2.0	7.8	1.6	0.4	0.3	0.1	0.1	0.2	0.0	
								Mitigation Required?	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	NO	
								Mitigation Vol. Req'd (ac-ft)	0.0	0.0	2.0	7.8	1.6	0.4	0.3	0.1	0.1	0.2	0.0	

Read More

Read file

Step of Transfer: SPR 2024

Match:	202	Match:	456										
	AtR	HtS	SiNB	NbIn	NtM	DWtB	BtTS	TS	TSiM	M	MtB	Total	
S (Last Time Step)	2.48	10.12	11.88	168.64	0.47	0.47	0.38	0.17	0.16	0.18	0.02	194.98	Total Effects without Tra
@ Last Time Step	2.48	10.12	11.88	168.65	0.47	0.47	0.38	0.17	0.16	0.19	0.02	194.99	Total Effects with Transf
ix Value Timestep)	2.48	10.12	11.88	168.64	0.47	0.47	0.38	0.17	0.16	0.18	0.02	194.98	Total Effects without Tra
Dep. After Transfer:	2.48	10.16	13.88	176.43	2.10	0.87	0.71	0.32	0.30	0.34	0.04	207.63	Total Effects with Transf

YEAR

1957

TRANSFER NAME:

29-2395,35-2924

SEASON

SPRING

ENTER CELL LOCATIONS:

TO' CELL

FROM1' CELL

FROM2' CELL

FROM3' CELL

ROW

82

97

61

COLUMN

93

124

164

TRIMESTER OF ACTIVITY

TO WELL

FROM1 WELL

FROM2 WELL

FROM3 WELL

Projected Use

With Transfer

Without Transfer

With Transfer

Without Transfer

With Transfer

Without Transfer

AF/TRIMESTER

AF/TRIMESTER

AF/TRIMESTER

AF/TRIMESTER

AF/TRIMESTER

AF/TRIMESTER

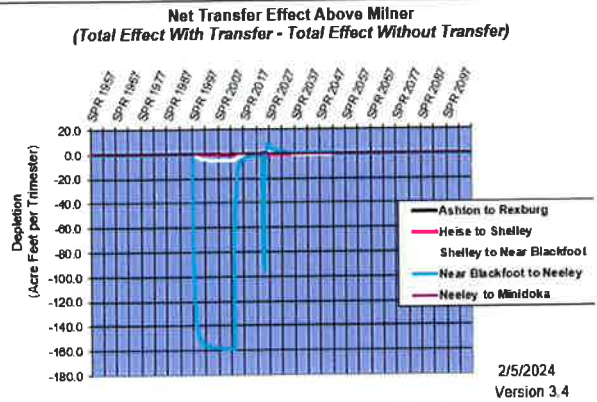
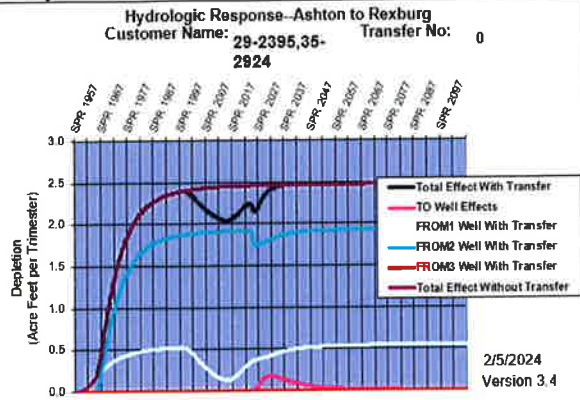
AF/TRIMESTER

SPR 1957	0.00	0.00	0.00	0.00	0.00	0.00
SUM 1957	0.00	0.00	0.00	0.00	0.00	0.00
WIN 1957	0.00	168.00	168.00	0.00	0.00	0.00
SPR 1958	0.00	168.00	168.00	0.00	0.00	0.00
SUM 1958	0.00	168.00	168.00	0.00	0.00	0.00
SPR 1964	0.00	168.00	168.00	0.00	0.00	0.00
SUM 1964	0.00	168.00	168.00	0.00	0.00	0.00
WIN 1964	0.00	168.00	168.00	0.00	0.00	0.00
SPR 1965	0.00	168.00	168.00	0.00	0.00	0.00
SUM 1965	0.00	168.00	168.00	27.00	27.00	0.00
WIN 1965	0.00	168.00	168.00	27.00	27.00	0.00
SPR 1966	0.00	168.00	168.00	27.00	27.00	0.00
SUM 1966	0.00	168.00	168.00	27.00	27.00	0.00

SUM 1996	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 1996	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 1997	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 1997	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 1998	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 1998	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 1999	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 1999	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2000	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2000	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2001	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2001	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2002	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2002	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2003	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2003	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2004	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2004	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2005	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2005	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2006	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2006	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2007	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2007	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2008	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2008	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2009	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2009	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2010	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2010	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2011	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2011	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2012	0.00	0.00	168.00	27.00	27.00	0.00	0.00
WIN 2012	0.00	0.00	168.00	27.00	27.00	0.00	0.00
SUM 2013	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2013	0.00	168.00	168.00	27.00	27.00	0.00	0.00

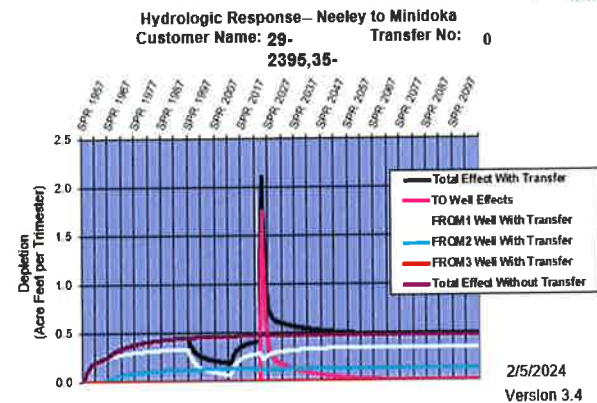
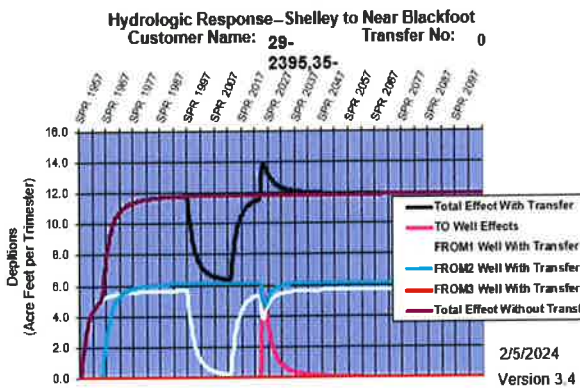
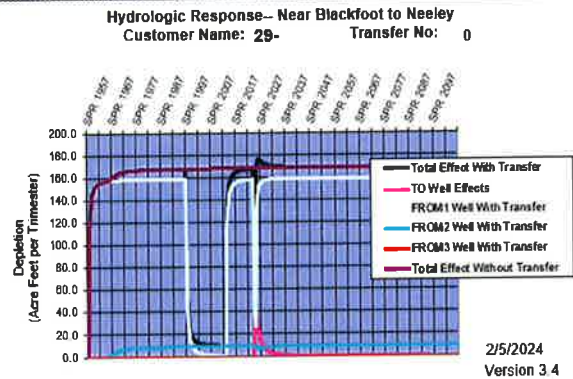
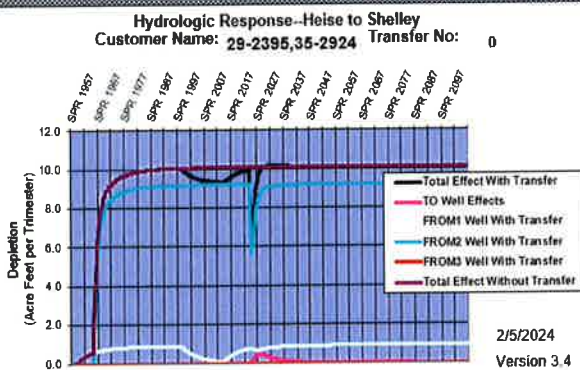
SPR 2014	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2014	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2014	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2015	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2015	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2015	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2016	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2016	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2016	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2017	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2017	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2017	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2018	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2018	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2018	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2019	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2019	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2019	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2020	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2020	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2020	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2021	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2021	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2021	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2022	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2022	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2022	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2023	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2023	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2023	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2024	195.00	0.00	168.00	0.00	27.00	0.00	0.00
SUM 2024	195.00	0.00	168.00	0.00	27.00	0.00	0.00
WIN 2024	195.00	0.00	168.00	0.00	27.00	0.00	0.00
SPR 2025	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SUM 2025	0.00	168.00	168.00	27.00	27.00	0.00	0.00
WIN 2025	0.00	168.00	168.00	27.00	27.00	0.00	0.00
SPR 2026	0.00	168.00	168.00	27.00	27.00	0.00	0.00

Graphs Above Milner

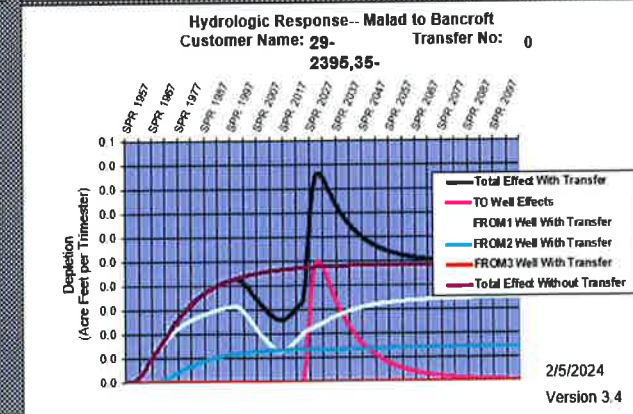
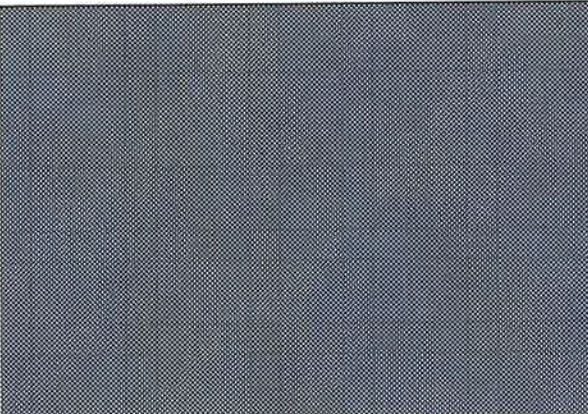
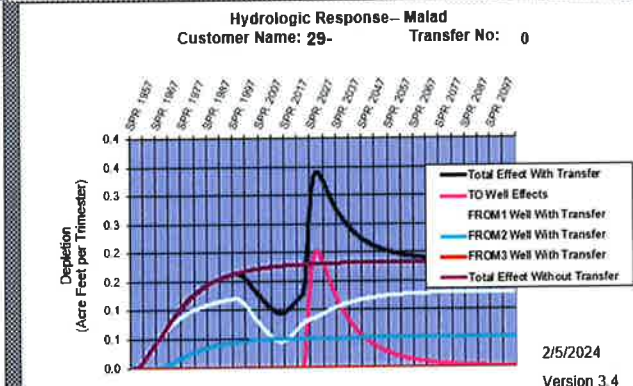
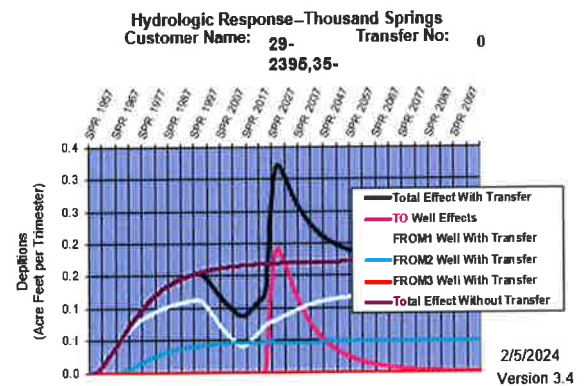
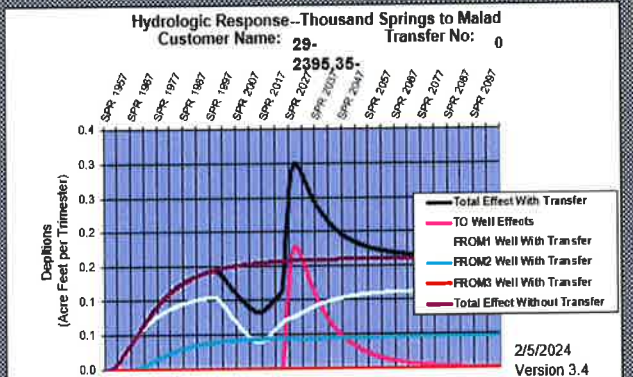
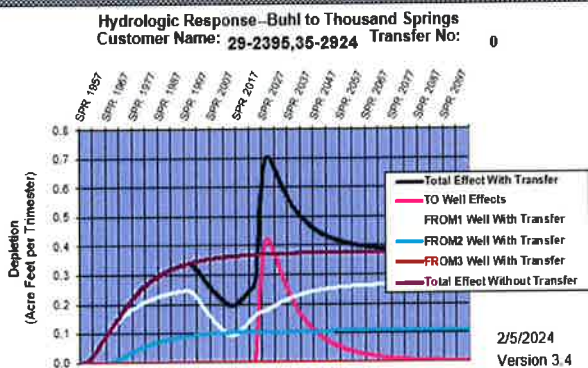
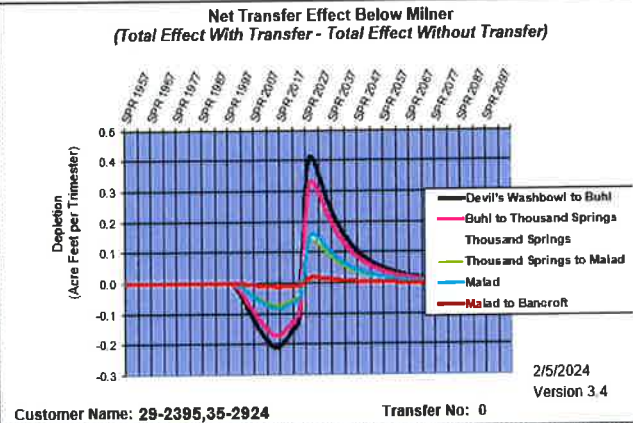
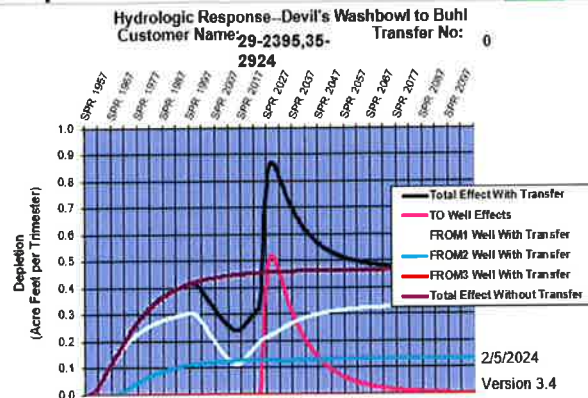


Customer Name: 29-2395,35-2924

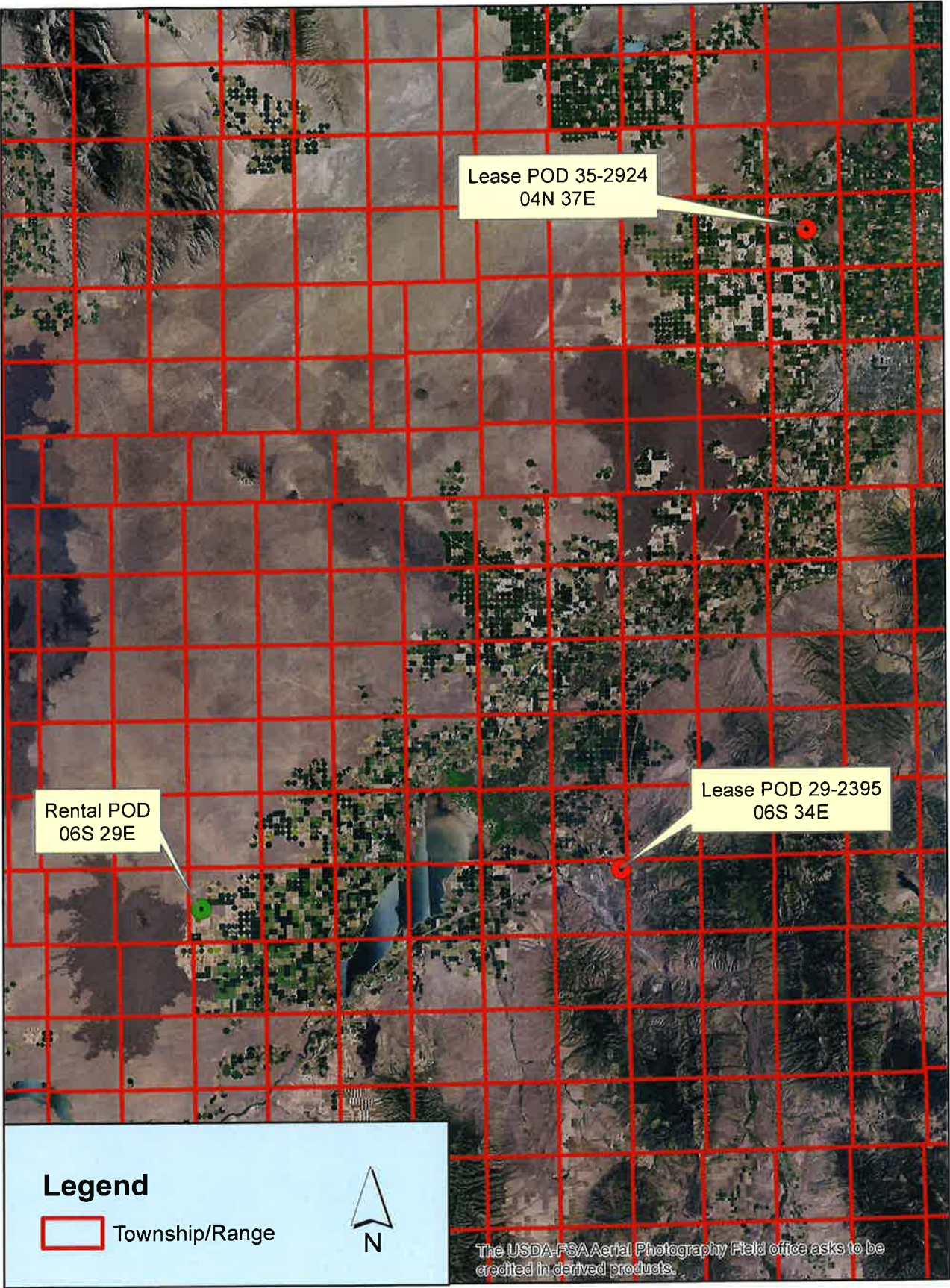
Transfer No: 0



Graphs Below Milner



WSB Rental Application #2785, County Line Farms 2024



Kienholz, Mackenzie

From: Kienholz, Mackenzie
Sent: Friday, February 9, 2024 3:54 PM
To: Jordan, Blake; Cefalo, James; The American Falls Aberdeen GWD
Cc: Bank
Subject: Comments Request - County Line Farms & PEP Rentals
Attachments: Move Map App 2785 County Line Farms.pdf; Rental Map 823 County Line Farms.pdf; Rental Review Memo - County Line Farms App 2785.pdf; Rental App 2807 Review Memo - PEP LLC.pdf; Move Map PEP 1 App 2807 as proposed.pdf; Rental Map 824 PEP LLC (1).pdf; Rental App 2806 Review Memo - PEP LLC.pdf; Move Map PEP 2 App 2806 as proposed.pdf; Rental Map 825 PEP 2.pdf; Rental App 2808 Review Memo - PEP LLC.pdf; Rental Map 826 PEP 3 2024.pdf; Move Map PEP 3 App 2808 as proposed.pdf

Good afternoon,

Please see the attached rental review documents for the following applications:

Rental Application #2785, 195 ac for County Line Farms (replacing active Agreement #752)
Rental Application #2806, 220 ac for PEP, LLC
Rental Application #2807, 270 ac for PEP, LLC
Rental Application #2808, 369.3 ac for PEP, LLC

Kindly respond with any questions or comments within 10 days.

Thank you,

Mackenzie Kienholz
Water Supply Bank Specialist



Planning & Projects
Mackenzie.kienholz@idwr.idaho.gov
Phone: (208) 287-4822

Kienholz, Mackenzie

From: Jason Helms <jasoncivil@alumni.nd.edu>
Sent: Wednesday, February 7, 2024 8:57 PM
To: Kienholz, Mackenzie
Subject: Re: Use of 35-2924 for County Line Farms WSB Rental Application

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Hi Mackenzie,
I think that will work great for 2024 and I see that 2 years doesn't work well but hopefully something can be figured out before then.
Thanks!
Jason C. Helms, PE
208-308-2109

On Mon, Feb 5, 2024 at 2:49 PM Kienholz, Mackenzie <Mackenzie.Kienholz@idwr.idaho.gov> wrote:

Jason,

As we discussed over the phone this afternoon, I completed modeling of 29-2395 and 35-2924 to see if these two rights could satisfy the County Line Farms rental request for a two-year term. Even when renting the full amounts of both rights, the modeling fails the Neeley to Minidoka reach. You mentioned during our phone call that County Line Farms has an agreement with the owner of 29-2395. For this reason, I adjusted my modeling to include the greatest number of acres from 29-2395 that still passed modeling. With your confirmation, I will allocate 168.0 acres from 29-2395 and 27.0 acres from 35-2924 to satisfy the County Line Farms rental application for 2024 (modeling attached).

Thank you,

Mackenzie Kienholz

Water Supply Bank Specialist



Planning & Projects

Mackenzie.kienholz@idwr.idaho.gov

Phone: (208) 287-4822

From: Kienholz, Mackenzie

Sent: Monday, February 5, 2024 11:03 AM

To: Jason Helms <jasoncivil@alumni.nd.edu>

Subject: Use of 35-2924 for County Line Farms WSB Rental Application

Good morning, Jason,

In the time since we last talked, I have been running different ETRAN modeling scenarios for County Line Farms and PEP, LLC as well as having several discussions about policy and injury with supervisors. At this time, due to some of the nuances of these rentals, I have the approval to evaluate the County Line Farms rental application for 2024 alone, that is I do not need to model previous rentals for this year's review. The proposal to rent 195 acres from 29-2395 for one year does not pass modeling on its own. It also does not pass when using 43-13595 and 43-13597 for mitigation. However, I have found another right, 35-2924, that models well with 29-2395. If County Line Farms rents the available 60.2 acres from 35-2924 and 134.8 acres from 29-2395 for a total of 195 acres in 2024, no additional water needs to be rented for mitigation. Right 35-2924 has a priority date of 7/21/1965. Is the applicant agreeable to this rental? This would free up 35-14041 and an additional portion of 29-2395 for the PEP, LLC rentals. I have attached a copy of my model run for you.

Thank you,

Mackenzie Kienholz

Water Supply Bank Specialist



Planning & Projects

Mackenzie.kienholz@idwr.idaho.gov

Phone: (208) 287-4822

Kienholz, Mackenzie

From: Jason Helms <jasoncivil@alumni.nd.edu>
Sent: Friday, January 5, 2024 2:22 PM
To: Kienholz, Mackenzie
Subject: Re: Availability for County Line Farms/PEP WSB Rentals
Attachments: CLF_WSB_2024_Dataentry1-mod.pdf; CLF_WSB_2024_Dataentry2-mit.pdf; CLF_WSB_2024_Stepwise1-mod.pdf; CLF_WSB_2024_Stepwise2-mit.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

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Hi Mackenzie,
Attached offsetting models with insertion of the historical diversion data as you requested for rental of 29-2395 for two years (2024 and 2025). The minor additional transient impacts indicated in the Neeley to Minidoka reach (would not require mitigation for an acceptable permanent transfer) mitigating peak impacts through targeted rental of 27.5 acres of water rights 43-43595 and 43-13597. If you have any information for inclusion of any un-rented portions of the water rights it would provide additional beneficial impacts. Please note the volume requiring mitigation each trimester to this minor reach is less than the volume authorized without a permit. Furthermore, normal operation of the American Falls dam to maintain constant pool in Lake Walcott automatically mitigates any depletion in the Neeley to Minidoka reach from credits generated in the Near Blackfoot to Neeley reach of the Snake river which are associated with spring flows into the American Falls reservoir. I tried to call but was unable to reach you to discuss over the phone. I think the department is fumbling over pennies while the water users are losing dollars. Hopefully this can work here.
Thanks,
Jason C. Helms, PE
208-308-2109

On Thu, Dec 28, 2023 at 8:08 AM Kienholz, Mackenzie <Mackenzie.Kienholz@idwr.idaho.gov> wrote:

Jason,

I have attached a query of availability in Basin 43. Based on the modeling submitted and the runs I did for the County Line Farms rental application, I don't see that any of the rentals provide any benefit to the Neeley to Minidoka reach to make up for the depletions that the County Line Farms rental would cause to that reach. I have attached a copy of a presentation that is available on the IDWR website regarding offsetting applications. Transfer Processing Memo No. 24 also has some guidance on this process. If you would like to submit modeling and a short discussion to make the case that the rental applications offset each other, please feel free to do so. If you do pursue this route, please submit the evidence that the rentals offset each other within **30 days**.

Below are lists of previous rentals at each of the current rental application locations. If you would like availability for any other basins or need any documents, please let me know.

Thank you,

Mackenzie Kienholz

Water Supply Bank Specialist



Planning & Projects

Mackenzie.kienholz@idwr.idaho.gov

Phone: (208) 287-4822

County Line Farms

	Years	WRs
RA 280	2019-2020	29-2395
RA 497	2021-2022	29-2395, 36-16458, 36-16460
RA 752	2023-2027	35-14041
App 2785	2024	29-2395

PEP 1 (629)

RA 200

RA 313

RA 387

RA 473

RA 629

App 2807

PEP 2 (641)

	Years	WRs
RA 118	2017	29-14012, 29-14013, 43-13595, 43-13597
RA 195	2018	29-14012, 29-14013, 43-13595, 43-13597
RA 314	2019	29-14012, 29-14013, 43-13595, 43-13597
RA 386	2020	29-14012, 29-14013, 43-13595, 43-13597, 35-7274
RA 641	2023	29-13143, 29-13144, 29-13827, 29-14013, 29-2292, 35-13711, 35-4062
App 2808	2024	29-13143, 29-13144, 29-14013, 29-2292, 35-13711, 35-4062, 29-14263, 35-14041

PEP 3 (749)

RA 749

App 2806

From: Jason Helms <jasoncivil@alumni.nd.edu>

Sent: Tuesday, December 26, 2023 2:31 PM

To: Kienholz, Mackenzie <Mackenzie.Kienholz@idwr.idaho.gov>
Subject: Re: Availability for County Line Farms/PEP WSB Rentals

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Hi Mackenzie,

I am requesting consideration of the offsetting impacts generated by the PEP rental of 35-14041. I believe it provides significant beneficial impacts in the Shelley to Near Blackfoot reach.

Also, the spreadsheet you sent me only seems to contain certain basins? Basin 43 could be useful?

Thanks,

Jason C. Helms, PE

208-308-2109

On Wed, Dec 20, 2023 at 3:57 PM Kienholz, Mackenzie <Mackenzie.Kienholz@idwr.idaho.gov> wrote:

Good afternoon, Jason,

I heard back from J. R. Simplot Co. today about their water rights I mentioned may be available. These rights were supposed to be part of a companion package and they have submitted the associated rental application. I queried groundwater ESPA availability from our software and have attached the Excel workbook with the results. Please take a look at the availability and let me know how you would like to move forward with the PEP, LLC and County Line Farms rental applications.

Thank you,

Mackenzie Kienholz

Water Supply Bank Specialist



Planning & Projects

Mackenzie.kienholz@idwr.idaho.gov

Phone: (208) 287-4822

ENHANCED GROUND-WATER RIGHTS TRANSFER

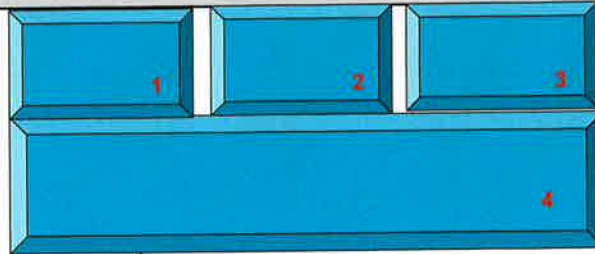
UNIVERSITY OF IDAHO - IDAHO WATER RESOURCES RESEARCH INSTITUTE | IDAHO DEPARTMENT OF AGRICULTURE

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ENTER STARTING DATE FOR SIMULATION. THEN PUSH "UPDATE DATES" BUTTON

YEAR: 1952
SEASON: 2024 Rental 29-2395

TRANSFER NO: County Line Farms
TRANSFER NAME: 2024 Rental 29-2395



Primary Rental
29-2395
2/28/1958
861.00 afa

35-14041
10/16/1974
780.00 afa

ENTER CELL LOCATIONS:

	'TO' CELL	'FROM1' CELL	'FROM2' CELL	'FROM3' CELL
ROW	82	97	70	66
COLUMN	93	124	55	128

36-16458 9/23/1965 47.5
36-16460 2/15/1974 180.4
Consumptive use fraction (3.0/4.0): 0.75
Total Maximum CU 1401.68
Proposed CU 1401.68

TRIMESTER OF ACTIVITY	6S29E-20SWNW		29-2395		36-16458,60		35-14041		Proposed CU	
	TO WELL		FROM1 WELL		FROM2 WELL		FROM3 WELL			
	Projected Use AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	
SPR 1952	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
WIN 1957	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
SPR 1958	0.00	215.25	215.25	0.00	0.00	0.00	0.00	0.00	0.00	
WIN 1965	0.00	215.25	215.25	0.00	0.00	0.00	0.00	0.00	0.00	
SPR 1966	0.00	215.25	215.25	11.88	11.88	0.00	0.00	0.00	0.00	
SUM 1966	0.00	215.25	215.25	11.88	11.88	0.00	0.00	0.00	0.00	
WIN 1973	0.00	215.25	215.25	11.88	11.88	0.00	0.00	0.00	0.00	
SPR 1974	0.00	215.25	215.25	56.98	56.98	0.00	0.00	0.00	0.00	
SUM 1974	0.00	215.25	215.25	56.98	56.98	0.00	0.00	0.00	0.00	
WIN 1974	0.00	215.25	215.25	56.98	56.98	0.00	0.00	0.00	0.00	
SPR 1975	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SUM 1996	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 1996	0.00	0.00	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 2006	0.00	0.00	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SPR 2007	0.00	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SUM 2007	0.00	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
WIN 2012	0.00	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SPR 2013	0.00	215.25	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SUM 2013	0.00	215.25	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
WIN 2018	0.00	215.25	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SPR 2019	215.25	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SUM 2019	215.25	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
WIN 2019	215.25	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SPR 2020	215.25	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SUM 2020	215.25	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
WIN 2020	215.25	0.00	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SPR 2021	215.25	0.00	215.25	0.00	56.98	0.00	0.00	195.00	195.00	
SUM 2021	215.25	0.00	215.25	0.00	56.98	0.00	0.00	195.00	195.00	
WIN 2021	215.25	0.00	215.25	0.00	56.98	0.00	0.00	195.00	195.00	
SPR 2022	215.25	0.00	215.25	0.00	56.98	0.00	0.00	195.00	195.00	
SUM 2022	215.25	0.00	215.25	0.00	56.98	0.00	0.00	195.00	195.00	
WIN 2022	215.25	0.00	215.25	0.00	56.98	0.00	0.00	195.00	195.00	
SPR 2023	195.00	215.25	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SUM 2023	195.00	215.25	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
WIN 2023	195.00	215.25	215.25	56.98	56.98	0.00	0.00	195.00	195.00	
SPR 2024	195.00	20.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SUM 2024	195.00	20.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 2024	195.00	20.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SPR 2025	195.00	20.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SUM 2025	195.00	20.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 2025	195.00	20.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SPR 2026	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SUM 2026	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 2026	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SPR 2027	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SUM 2027	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 2027	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 2100	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SPR 2101	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
SUM 2101	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	
WIN 2101	0.00	215.25	215.25	56.98	56.98	195.00	195.00	195.00	195.00	

ENHANCED GROUND-WATER RIGHTS TRANSFER

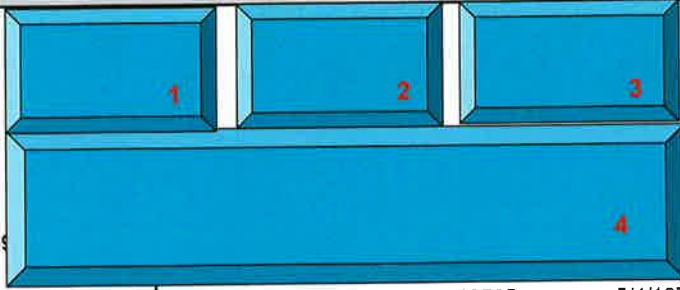
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IDAHO DEPA

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set up for user entries

ENTER STARTING DATE FOR
SIMULATION. THEN PUSH
"UPDATE DATES" BUTTON
YEAR 1952
SEASON

TRANSFER NO:
County Line Farms
TRANSFER NAME:
2024 Mitigation 29-2395



Primary Rental
29-2395

ac
25.7
94.3
mitigation rental

ENTER CELL LOCATIONS:

	'TO' CELL	'FROM1' CELL	'FROM2' CELL	'FROM3' CELL
ROW	82	91		
COLUMN	93	69		

43-13595 5/4/1978 69.46
43-13597 5/23/1962 24.84
Consumptive use fraction (3.0/4.0): 0.75
Total Maximum CU 70.73
Proposed CU 70.73

TRIMESTER OF ACTIVITY	TO WELL Projected Use AF/TRIMESTER	FROM1 WELL		FROM2 WELL		FROM3 WELL	
		With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER	With Transfer AF/TRIMESTER	Without Transfer AF/TRIMESTER
SPR 1952	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIN 1961	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPR 1962	0.00	6.21	6.21	0.00	0.00	0.00	0.00
SUM 1962	0.00	6.21	6.21	0.00	0.00	0.00	0.00
WIN 1962	0.00	6.21	6.21	0.00	0.00	0.00	0.00
SPR 1963	0.00	6.21	6.21	0.00	0.00	0.00	0.00
WIN 1977	0.00	6.21	6.21	0.00	0.00	0.00	0.00
SPR 1978	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SUM 1978	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 1978	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SPR 1979	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 1994	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SPR 1995	0.00	0.00	23.58	0.00	0.00	0.00	0.00
SUM 1995	0.00	0.00	23.58	0.00	0.00	0.00	0.00
WIN 1995	0.00	0.00	23.58	0.00	0.00	0.00	0.00
SPR 1996	0.00	0.00	23.58	0.00	0.00	0.00	0.00
WIN 2010	0.00	0.00	23.58	0.00	0.00	0.00	0.00
SPR 2011	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SUM 2011	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 2011	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SPR 2012	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 2023	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SPR 2024	0.00	0.00	23.58	0.00	0.00	0.00	0.00
SUM 2024	0.00	0.00	23.58	0.00	0.00	0.00	0.00
WIN 2024	0.00	0.00	23.58	0.00	0.00	0.00	0.00
SPR 2025	0.00	0.00	23.58	0.00	0.00	0.00	0.00
SUM 2025	0.00	0.00	23.58	0.00	0.00	0.00	0.00
WIN 2025	0.00	0.00	23.58	0.00	0.00	0.00	0.00
SPR 2026	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SUM 2026	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 2026	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SPR 2027	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SUM 2027	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 2027	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 2100	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SPR 2101	0.00	23.58	23.58	0.00	0.00	0.00	0.00
SUM 2101	0.00	23.58	23.58	0.00	0.00	0.00	0.00
WIN 2101	0.00	23.58	23.58	0.00	0.00	0.00	0.00

WIN 2101	6.1	10.1	52.5	363.5	4.4	10.3	8.3	3.8	3.5	3.9	0.5	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0
	1.31%	2.17%	11.25%	77.86%	0.94%	2.21%	1.78%	0.80%	0.74%	0.83%	0.11%								

Enter First Time Step of Transfer: **SPR 2010**

Match: 175

Match: 456

	AtR	HtS	StNB	NBtN	NtM	DWtB	BtTS	TS	TStM	M	MtB	Total	
Preexisting Effects @ SS (Last Time Step):	6.10	10.14	52.49	363.47	4.38	10.31	8.28	3.75	3.47	3.88	0.51	466.79	Total Effects without Tra
Steady State - Value of Dep. @ Last Time Step:	6.10	10.14	52.50	363.49	4.39	10.32	8.29	3.75	3.47	3.88	0.51	466.83	Total Effects with Transl
Preexisting Effects @ Transient State (Max Value Timestep):	6.10	10.14	52.49	363.47	4.38	10.31	8.28	3.75	3.47	3.88	0.51	466.79	Total Effects without Tra
Transient State - Max. Value of Dep. After Transfer:	6.10	10.14	52.75	369.23	6.99	11.38	9.15	4.15	3.83	4.29	0.56	478.56	Total Effects with Transl
Steady State Change:	-0.01	0.00	0.00	0.02	0.00	0.01	0.01	0.00	0.00	0.00	0.00		
Transient State Change:	-0.01	0.00	0.26	5.75	2.60	1.07	0.87	0.39	0.37	0.42	0.05		

STEPWISE IMPACTS:

SUM 2022	-3.7	-6.4	-27.8	-240.0	1.8	-1.0	-0.7	-0.3	-0.3	-0.3	0.0
WIN 2022	-3.7	-6.3	-27.2	-238.5	1.9	-1.0	-0.8	-0.3	-0.3	-0.3	0.0
SPR 2023	-3.7	-6.2	-26.3	-141.5	1.9	-1.0	-0.8	-0.3	-0.3	-0.3	0.0
SUM 2023	-3.7	-6.1	-25.4	-92.2	1.9	-0.9	-0.7	-0.3	-0.3	-0.3	0.0
WIN 2023	-3.7	-6.0	-24.4	-70.4	1.9	-0.7	-0.6	-0.3	-0.2	-0.2	0.0
SPR 2024	-3.7	-5.9	-18.3	-118.8	2.1	-0.5	-0.5	-0.2	-0.2	-0.2	0.0
SUM 2024	-3.7	-5.7	-13.4	-136.5	2.19	-0.3	-0.3	-0.1	-0.1	-0.1	0.0
WIN 2024	-3.6	-5.4	-9.6	-137.6	2.3	-0.1	-0.2	-0.1	-0.1	-0.1	0.0
SPR 2025	-3.6	-5.0	-6.5	-133.5	2.5	0.0	0.0	0.0	0.0	0.0	0.0
SUM 2025	-3.5	-4.6	-3.9	-128.4	2.6	0.2	0.1	0.1	0.0	0.0	0.0
WIN 2025	-3.5	-4.2	-1.7	-123.5	2.7	0.4	0.3	0.1	0.1	0.1	0.0
SPR 2026	-3.4	-3.8	-0.5	-42.9	2.2	0.6	0.4	0.2	0.2	0.2	0.0
SUM 2026	-3.3	-3.4	0.1	-7.7	1.7	0.8	0.6	0.2	0.2	0.2	0.0
WIN 2026	-3.2	-3.0	0.4	3.6	1.4	0.9	0.7	0.3	0.3	0.3	0.0
SPR 2027	-3.1	-2.7	0.5	6.6	1.1	1.0	0.8	0.4	0.3	0.3	0.0
SUM 2027	-3.0	-2.4	0.5	6.8	0.9	1.1	0.9	0.4	0.4	0.4	0.0
WIN 2027	-2.8	-2.2	0.5	6.4	0.8	1.2	0.9	0.4	0.4	0.4	0.0
SPR 2028	-2.7	-1.9	0.5	5.8	0.7	1.3	1.0	0.4	0.4	0.5	0.1
SUM 2028	-2.6	-1.8	0.5	5.3	0.6	1.3	1.0	0.5	0.4	0.5	0.1
WIN 2028	-2.5	-1.6	0.4	4.8	0.6	1.3	1.1	0.5	0.4	0.5	0.1

WIN 2101	0.2	0.3	1.7	7.4	8.2	1.9	1.6	0.7	0.7	0.7	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	0.81%	1.33%	7.06%	31.49%	35.04%	8.25%	6.65%	3.02%	2.80%	3.15%	0.42%							

Enter First Time Step of Transfer: **SPR 2010**

Match: 175 Match: 456

	AtR	HtS	StNB	NbTN	NtM	DWtB	BtTS	TS	TStM	M	MtB	Total	
Preexisting Effects @ SS (Last Time Step):	0.19	0.31	1.66	7.41	8.20	1.94	1.56	0.71	0.66	0.74	0.10	23.49	Total Effects without Tra
Steady State - Value of Dep. @ Last Time Step:	0.19	0.31	1.65	7.37	8.20	1.93	1.56	0.71	0.65	0.74	0.10	23.40	Total Effects with Transl
Preexisting Effects @ Transient State (Max Value Timestep):	0.19	0.31	1.66	7.41	8.20	1.94	1.56	0.71	0.66	0.74	0.10	23.49	Total Effects without Tra
Transient State - Max. Value of Dep. After Transfer:	0.19	0.31	1.65	7.37	8.20	1.93	1.56	0.71	0.65	0.74	0.10	23.40	Total Effects with Transl
Steady State Change:	0.00	0.00	-0.01	-0.04	0.00	-0.01	-0.01	0.00	0.00	0.00	0.00		
Transient State Change:	0.00	0.00	-0.01	-0.04	0.00	-0.01	-0.01	0.00	0.00	0.00	0.00		

STEPWISE IMPACTS:

	AtR	HtS	StNB	NbTN	NtM	DWtB	BtTS	TS	TStM	M	MtB	Total
SPR 2022	-0.1	-0.2	-0.8	-3.2	-1.4	-0.8	-0.7	-0.3	-0.3	-0.3	0.0	-8.1
SUM 2022	-0.1	-0.2	-0.7	-3.1	-1.4	-0.8	-0.7	-0.3	-0.3	-0.3	0.0	-7.9
WIN 2022	-0.1	-0.1	-0.7	-3.1	-1.3	-0.8	-0.7	-0.3	-0.3	-0.3	0.0	-7.7
SPR 2023	-0.1	-0.1	-0.7	-3.0	-1.3	-0.8	-0.6	-0.3	-0.3	-0.3	0.0	-7.6
SUM 2023	-0.1	-0.1	-0.7	-2.9	-1.2	-0.8	-0.6	-0.3	-0.3	-0.3	0.0	-7.4
WIN 2023	-0.1	-0.1	-0.7	-2.9	-1.2	-0.8	-0.6	-0.3	-0.3	-0.3	0.0	-7.2
SPR 2024	-0.1	-0.1	-0.7	-2.8	-1.28	-0.7	-0.6	-0.3	-0.3	-0.3	0.0	-7.2
SUM 2024	-0.1	-0.1	-0.7	-2.7	-1.5	-0.7	-0.6	-0.3	-0.3	-0.3	0.0	-7.3
WIN 2024	-0.1	-0.1	-0.6	-2.7	-1.8	-0.7	-0.6	-0.3	-0.2	-0.3	0.0	-7.5
SPR 2025	-0.1	-0.1	-0.6	-2.6	-2.1	-0.7	-0.6	-0.3	-0.2	-0.3	0.0	-7.7
SUM 2025	-0.1	-0.1	-0.6	-2.6	-2.4	-0.7	-0.6	-0.3	-0.2	-0.3	0.0	-7.9
WIN 2025	-0.1	-0.1	-0.6	-2.6	-2.7	-0.7	-0.5	-0.3	-0.2	-0.3	0.0	-8.1
SPR 2026	-0.1	-0.1	-0.6	-2.5	-2.8	-0.7	-0.5	-0.2	-0.2	-0.3	0.0	-8.1
SUM 2026	-0.1	-0.1	-0.6	-2.5	-2.8	-0.7	-0.5	-0.2	-0.2	-0.3	0.0	-8.0
WIN 2026	-0.1	-0.1	-0.6	-2.5	-2.7	-0.7	-0.5	-0.2	-0.2	-0.3	0.0	-7.9
SPR 2027	-0.1	-0.1	-0.6	-2.5	-2.6	-0.7	-0.5	-0.2	-0.2	-0.3	0.0	-7.8
SUM 2027	-0.1	-0.1	-0.6	-2.5	-2.5	-0.7	-0.5	-0.2	-0.2	-0.3	0.0	-7.6
WIN 2027	-0.1	-0.1	-0.6	-2.5	-2.4	-0.7	-0.5	-0.2	-0.2	-0.3	0.0	-7.5
SPR 2028	-0.1	-0.1	-0.6	-2.5	-2.2	-0.7	-0.5	-0.2	-0.2	-0.3	0.0	-7.4
SUM 2028	-0.1	-0.1	-0.6	-2.5	-2.1	-0.6	-0.5	-0.2	-0.2	-0.3	0.0	-7.3
WIN 2028	-0.1	-0.1	-0.6	-2.5	-2.0	-0.6	-0.5	-0.2	-0.2	-0.2	0.0	-7.2