



IDAHO DEPARTMENT OF
WATER RESOURCES

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Governor Brad Little

Director Mathew Weaver

SHEKINAH INDUSTRIES INC
ATTN: MICHAEL PRESTON
420 BITTERROOT DR
BOISE, ID 83709

Re: Ground Water Monitoring-Reporting Plan for Water Right Transfer No. 78356 (61-12280, 61-12281, 61-12282, 61-12283, 61-12284 & 61-12285)

Dear Water Right Holder,

The Idaho Department of Water Resources ("The Department") approved Transfer No. 78356 with the following condition:

"Diversion and use of water in connection with this right is subject to a Monitoring-Reporting Plan. The right holder shall provide the Department with a plan for monitoring-reporting aquifer levels, diversion flow rates, and volumes. The monitoring-reporting should occur in parallel with land development and production and should include identification of non-production wells and timelines for measuring and reporting..."

The Department received a proposed Ground Water Monitoring-Reporting Plan ("Monitoring Plan") for the above-mentioned water rights involved in Transfer No. 78356 in the form of a letter dated May 05, 2020. The Department has reviewed the Monitoring-Reporting Plan and has a few comments:

1. Groundwater Monitoring

1.1. Installation of pressure transducers in the pumping wells (J&M PW. No.1 D0080123, J&M PW No. 2 D0082843), with a reading frequency of every six hours for the first year, and re-evaluation thereafter.

1.2. Installation of a barometric pressure recorder in the shallow observation well, with a reading frequency of every six hours for the first year, and re-evaluation thereafter.

Comment: Pressure Transducers (including barometric pressure) with a reading frequency of every six hours is adequate.

1.3 Quarterly hand measurement of water levels for the first year for production wells and the monitoring well, and re-evaluation of measurement frequency thereafter.

Comment: It is requested that quarterly hand measurement of water levels for production wells and the monitoring well be performed, with the first measurement

occurring within 30 days prior to the start of irrigation season and a measurement occurring within 30 days after irrigation has ceased. (Measurements are not required in production wells during pumping).

1.4. Monitoring at an increased frequency (1-hour) in the pumping well at the end of the irrigation season to facilitate water level recovery analysis.

Comment: Monitoring at an increased frequency (1-hour) in the pumping well at the end of the irrigation season to facilitate water level recovery analysis is adequate.

2. Flow Monitoring

2.1. Installation of a flowmeter on the production wells (e.g. magmeter) to record and report discharge annually until further notice from the Department.

Comment: Reporting of flowmeter discharge rate and volume should be included in each annual report submittal.

2.2. The flowmeter should meet IDWR's minimum acceptable standards for measurement and reporting of surface and groundwater diversions.

Comment: An installed flowmeter meeting the Departments minimum acceptable standards is adequate.

3. Facility Operation

3.1. Initiation of pumping using an uninterrupted, constant withdrawal rate, over 2-day time period, to evaluate the effects of extended pumping.

Comment: Was the 2-day pump test performed? If not, it is not necessary to perform since pumping has commenced and data is being reported to the Department.

4. IDWR Reporting

4.1. Reporting of water level data on a monthly basis to IDWR for the first year, and re-evaluation of submittal frequency thereafter.

Comment: Reporting of water level data on an annual basis to IDWR by January 15th is adequate.

4.2. Submission of an annual report to IDWR that would include: Analysis of water level trends in the production wells, and shallow monitoring well, reporting of discharge rates over time and analysis in relation to water level trends, and reporting of crops grown and acres irrigated during the year.

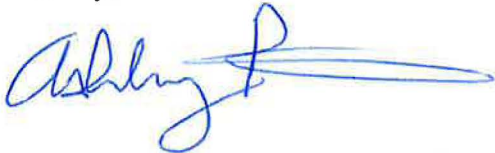
Comment: Submission of an annual report by January 15th to IDWR that would include analysis of water level trends in the production wells, and shallow

monitoring well, reporting of discharge (rate and volume) over time and analysis in relation to water level trends, reporting of crops grown and acres irrigated during the year, and reporting of any transducer/water level data (in Excel format preferably) and any observed diversion rates and manual measurements for all wells is adequate.

The Monitoring Plan states that it is proposed on behalf of J&M Solid Rock, LLC and Shekinah Industries Inc. After discussion with Ken Neely (consultant) it appears that the Monitoring Plan will include all landowners that Shekinah Industries, Inc. water rights have been divided into and that include the above-mentioned reporting condition (Duane & Cheryl Amyx, Paul & Sheila Hudson, J&M Solid Rock, LLC, and Shekinah Industries Inc.). Please specify this in the updated Monitoring Plan submittal.

The next steps would be to submit an updated Monitoring-Reporting Plan to the Department for review and approval. If you have any questions or wish to discuss anything with regards to this letter, feel free to email me at ashley.ritter@idwr.idaho.gov or call (208) 287-4907. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ashley M. Ritter', with a long horizontal flourish extending to the right.

Ashley M. Ritter, E.I.T., G.I.T. | Associate Engineer
Idaho Department of Water Resources-State Office
(208) 287-4907 | www.idwr.idaho.gov

Attachments: Ground Water Monitoring-Reporting Plan dated May 05, 2020

Cc: Ken Neely
Tim Farrell
Duane & Cheryl Amyx
Paul & Sheila Hudson
J&M Solid Rock, LLC