

MEMORANDUM

Date: January 8, 2026
To: Transfer 90212
From: McKenna Webster
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes a clerical error correction. The point of diversion was incorrectly placed in R32E rather than R23E. While looking at maps, it was brought to the applicant's attention that the historical point of diversion is in the SESE Sec 29 T12N R23E rather than the NENE Sec 32 T12N R23E described on the decree. No physical change is occurring. This is simply a correction to more accurately describe the historical point of diversion.

Authority to File:

According to IDWR records, the applicant is the current owner of the water right included in the transfer. Additionally, Custer County parcel data shows that the applicant is the owner of the place of use. The annual report shows Michael Tunney having authority to sign.

Water Right Validity:

The water right was decreed in the SRBA in 2000. Aerial and Google Earth imagery show evidence of cattle on the property for over a decade. Though cattle are not seen in 2023 imagery, there is, what appears to be, a corral near where the cattle have been seen previously. The department has found no evidence to suggest forfeiture of water right 73-10013.

Injury to Other Water Rights:

There is no physical change to the point of diversion as it is just a clerical error correction. As a result, no other water rights will be injured. This application will be processed with no advertisement.

Enlargement of Use:

The proposed changes will not result in enlargement because the authorized diversion rate will not increase as a result of the transfer.

Local Public Interest:

No issues identified.

Beneficial Use / Conservation of Water Resources:

No issues identified.

Effect on Economy of the Local Area:

No issues identified.

Effect on Agricultural Base of the Local Area:

No issues identified.

Review of the application finds there is no clear inconsistency with criteria set forth in Section 42-222 Idaho Code preventing processing of this application.

Memo

Double Springs Ranch LLC - January 8, 2026

Over the course of two months, I attempted to schedule a time to discuss the place of use for the Double Springs Ranch Transfer with the representative, Michael Lawrence. No phone conversation was had despite multiple attempts. Ultimately, after several weeks of no response, a 14-day deadline was given, ending December 22, 2025. On December 15, 2025, Mr. Lawrence contacted me via phone to discuss the place of use associated with water right 73-10013. He described a barn in the SESE Section 29 T12N R23E where water is used. The applicant wondered about including the barn in the place of use for this water right. New maps and application pages were drawn up and sent to Mr. Lawrence to review with the applicant. No response was received.

With the holidays, I neglected to send a reminder email, and, therefore, extended the deadline to January 7, 2026.

A reminder email was sent January 6, 2026. I received a call from Mr. Lawrence on January 7th stating that he had been unable to reach Double Springs Ranch and to continue processing the application as is. He mentioned that water use at the barn could fall under the domestic exemption, not requiring it to be added to water right 73-10013



McKenna Webster

January 8, 2026