

MEMORANDUM

Date: February 11, 2026
To: Transfer 90298
From: Christian Stewart
Re: Review & Evaluation of Sufficiency of Information

This transfer proposes to change the place of use for two groundwater rights and modify a condition to the water rights that clarifies the extent of the overlap between the groundwater rights and surface water from Reno Ditch Company.

Authority to File: The owners of record for the water rights are L2 LTD Partnership and L3 LTD Partnership. The application includes a quitclaim deed from L2 & L3 LTD Partnerships conveying the property associated with the place of use for water rights 32-2100 and 32-10154 to L2 LLC and L3 LLC. The ownership for these water rights will be updated to L2 LLC and L3 LLC. The application was signed by Lane Newman, Manager of L3 LLC and Lewis Newman, Manager of L2 LLC.

Water Right Validity: Rights 32-2100 and 32-10154 were decreed in the SRBA on 10/27/2000. The place of use is irrigated by a pivot irrigation system. This transfer proposes moving 10.8 acres from pivot corners to cover a portion of a mini pivot that currently has no water rights. There is no forfeiture issues associated with the 10.8 acres being changed.

Injury to Other Water Rights: The proposed changes would not affect other water rights or have an impact on the hydrologic source. This transfer will be processed with no advertisement. The watermaster does not oppose the application. No injury issues identified.

Enlargement of Use: The transfer proposes to change the place of use for 10.8 irrigated acres by drying up pivot corners. The proposed place of use will be irrigated by a small pivot. The changed acres will be irrigated using the same commingled irrigation delivery system as before. No water rights are being unstacked.

Before the formation of the Reno Ditch Company, water rights 32-62, 32-70B, and 32-2045 authorized the irrigation of 320 acres in SW1/4 Sec 8 and SE1/4 Sec 7. 160 of those acres overlapped water right license 32-2100 in SW1/4 Sec 8. An additional 160 acres overlapped the enlargement place of use for rights 32-2100 and 32-10154 in SE1/4 Sec 7. Before the formation of Reno Ditch Company, water rights 32-62, 32-70B, and 32-2045 overlapped 320 acres of the eventually decreed place of use for rights 32-2100 and 32-10154.

In 1999, rights 32-62, 32-70B, and 32-2045 were incorporated into Reno Ditch Company's permissible place of use through transfer 5450. The proposed condition that clarifies that 320 acres of Reno Ditch Company water overlaps rights 32-2100 and 32-10154 is accurate. No enlargement issues identified.

Local Public interest: No issues identified.

Beneficial Use/Conservation of Water Resources: 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.