



July 29, 2024

Dante Luongo
Oregon Water Resources Department
725 Summer Street NE, Suite A
Salem, OR 97301

Re: Updates to Transfer Application T-13777, in the name of Amazon Data Services, Inc.

Dear Dante:

On July 8, 2021, GSI submitted Transfer Application T-13777 on behalf of Amazon Data Services, Inc. (Applicant). Transfer T-13777 requests changes to five water right certificates, including changing the character of use, place of use and point of appropriation for all of Certificate 53194 and a portion of Certificate 53193. On April 8, 2022, GSI submitted revisions to the application related to updating the location for Proposed Well 1 and adding a Proposed Well 2 for Certificates 53193 and 53194. The Oregon Water Resources Department's (OWRD's) groundwater review for the application concluded that the proposed points of appropriation were not within the same aquifer as the authorized point of appropriation. On May 15, 2023, GSI submitted revisions to the transfer application to request a new location for Proposed Well 1 and eliminate Proposed Well 2. OWRD's groundwater review for the revised application concluded that the proposed point of appropriation would not appropriate groundwater from the same aquifer as the authorized point of appropriation.

GSI is submitting the enclosed application pages to modify the proposed construction for Proposed Well 1. The changes are intended to resolve OWRD's concern regarding the aquifer from which the proposed well will appropriate groundwater. New and revised information is attached and highlighted to show what has been revised - the target aquifer is revised to clearly specify the flowtop of the Pomona Member (CRBG). Please replace the original transfer application pages with the enclosed pages. These requested updates do not change the source of water or increase the appurtenant area under these water rights.

The Applicant is not requesting Reimbursement Authority processing of this transfer application moving forward.

Please contact me if you have any questions or concerns. My telephone number is 541-257-9001.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Sussman", is written over a light blue horizontal line.

Adam Sussman
Principal Water Resources Consultant

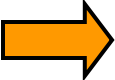
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Enclosures: Water Right Transfer Application Pages

For Place of Use or Character of Use Changes

Are there other water right certificates, water use permits or ground water registrations associated with the “from” or the “to” lands? Yes No

If YES, list the certificate, water use permit, or ground water registration numbers: **Certificates 53195 and 53260 are also appurtenant to the “from” lands. The layered portions of both Certificates 53195 and 53260 are included in this transfer application. The following certificates are appurtenant to the “to” lands: 53193, 53194, 53195, 53196, 53260 and 89006. However, the Applicant is requesting to change Certificate 53193 to industrial use, and “layering” is not applicable to industrial use water rights.**

 Pursuant to ORS 540.510, any “layered” water use such as an irrigation right that is supplemental to a primary right proposed for transfer must be included in the transfer or be cancelled. Any change to a ground water registration must be filed separately in a ground water registration modification application.

For Substitution (ground water supplemental irrigation will be substituted for surface water primary irrigation) -N/A

Ground water supplemental Permit or Certificate # _____;
Surface water primary Certificate # _____.

SUPERSEDING

For a change from Supplemental Irrigation Use to Primary Irrigation Use -N/A

Identify the primary certificate to be cancelled. Certificate # _____

For a change in point(s) of appropriation (well(s)) or additional point(s) of appropriation:

Well log(s) are attached for each authorized and proposed well(s) that are clearly labeled and associated with the corresponding well(s) in Table 1 above and on the accompanying application map.
(See Attachment F)

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AND/OR

Describe the construction of the authorized and proposed well(s) in Table 3 for any wells that do not have a well log. For *proposed wells not yet constructed or built*, provide “a best estimate” for each requested information element in the table. The Department recommends you consult a licensed well driller, geologist, or certified water right examiner to assist with assembling the information necessary to complete Table 3.

Table 3. Construction of Point(s) of Appropriation

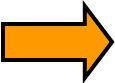
Any well(s) in this listing must be clearly tied to corresponding well(s) described in Table 1 and shown on the accompanying application map. Failure to provide the information will delay the processing of your transfer application until it is received. The information is necessary for the department to assess whether the proposed well(s) will access the same source aquifer as the authorized point(s) of appropriation (POA). The Department is prohibited by law from approving POA changes that do not access the same source aquifer.

Proposed or Authorized POA Name or Number	Is well already built? (Yes or No)	If an existing well: OWRD Well ID Tag No. L-____	Total well depth	Casing Diameter	Casing Intervals (feet)	Seal depth(s) (intervals)	Perforated or screened intervals (in feet)	Static water level of completed well (in feet)	Source aquifer (sand, gravel, basalt, etc.)	Well-specific rate (cfs or gpm). If less than full rate of water right
Proposed Well 1	No	-	100 ft (est.)	12 in (est.)	0-50 ft (est.)	0-50 ft (est.)	-	85 ft	Pomona Member flowtop (CRBG)	300 gpm

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