

# Groundwater Transfer Review Summary Form

Transfer/PA # T- 14663

GW Reviewer Mitra Khadka Date Review Completed: 8/14/2025

## Summary of Same Source Review:

☐ The proposed change in point of appropriation is not within the same aquifer as per OAR 690-380-2110(2).

## Summary of Water Level Decline Condition Review:

☐ Water levels at the original point(s) of appropriation have exceeded the allowed decline threshold defined by conditions in the originating water right.

## Summary of Injury Review:

☐ The proposed transfer will result in another, existing water right not receiving previously available water to which it is legally entitled or result in significant interference with a surface water source as per 690-380-0100(3).

## Summary of GW-SW Transfer Similarity Review:

☐ The proposed SW-GW transfer doesn't meet the definition of "similarly" as per OAR 690-380-2130.

*This is only a summary. Documentation is attached and should be read thoroughly to understand the basis for determinations.*



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## Ground Water Review Form:

- ☐ Water Right Transfer  
☐ Permit Amendment  
☒ GR Modification  
☐ Other

Application: T-14663

Applicant Name: DNJ, LLC

Proposed Changes: ☐ POA ☒ APOA ☐ SW→GW ☐ RA  
☐ USE ☒ POU ☐ OTHER

Reviewer(s): Mitra Khadka

Date of Review: 8/14/2025

Date Returned to WRSD: 8/15/2025

The information provided in the application is insufficient to evaluate whether the proposed transfer may be approved because:

- ☐ The water well reports provided with the application do not correspond to the water rights affected by the transfer.
- ☐ The application does not include water well reports or a description of the well construction details sufficient to establish the ground water body developed or proposed to be developed.
- ☐ Other \_\_\_\_\_

1. Basic description of the changes proposed in this transfer: Applicant proposes adding two additional wells, BENT 55321 and BENT 55224, to Certificate 50258 (Priority Date: February 15, 1977). Currently, Certificate 50258 authorizes irrigation of 30 acres at a maximum rate of 0.38 cfs from an authorized POA, BENT 2588. The applicant also proposes to change the place of use (POU) for all 30 acres under Certificate 50258 to an adjacent parcel to irrigate higher-value crops. Application does not indicate well-specific pumping rates. Therefore, the review of this application will consider the maximum permitted rate for each well when evaluating the impacts to neighboring users and surface water.
2. Will the proposed POA develop the same aquifer (source) as the existing authorized POA?  
☒ Yes ☐ No Comments: The current authorized POA and the proposed APOAs are completed in and will produce groundwater from the same Willamette Aquifer. In this area, the Willamette Aquifer is composed of unconsolidated sands and gravels of late Pleistocene alluvial fan and braid-plain deposits (Gannet and Caldwell, 1998; Conlon et al., 2005). Locally, the aquifer is ~20-30 ft thick and is confined by overlying fine-grained, low-permeability Willamette Silt Unit (WSU).
3. a) Is the existing authorized POA subject to a water level decline condition?  
☐ Yes ☒ No Comments: There are no decline conditions associated with Certificate 50258.

- b) If yes, for each POA identify the reference level, most recent spring-high water level, and whether an applicable permit decline condition has been exceeded: \_\_\_\_\_
4. a) Is there more than one source developed under the right (e.g., basalt and alluvium)?  
☐ Yes ☒ No Comments: \_\_\_\_\_
- b) If yes, estimate the portion of the right supplied by each of the sources and describe any limitations that will need to be placed on the proposed change (rate, duty, etc.): \_\_\_\_\_
5. a) Will this proposed change, at its maximum allowed rate of use, likely result in an increase in interference with **another ground water right**?  
☒ Yes ☐ No Comments: The nearest groundwater users to the APOAs, BENT 55224 and BENT 55321 appear to be BENT 2544 and BENT 55432, respectively. Both are located at shorter distances than the authorized POA, BENT 2588. The reduced intervening distances would increase the potential for well interference with adjacent groundwater rights.
- b) If yes, would this proposed change, at its maximum allowed rate of use, likely result in another groundwater right not receiving the water to which it is legally entitled?  
☐ Yes ☒ No If yes, explain: Potential interference with BENT 2544 and BENT 55432 from the proposed changes were evaluated using the Theis (1935) solution for drawdown in a confined aquifer (see attached Well Interference Analyses). The results indicate that the proposed changes are unlikely to injure neighboring groundwater rights.
6. a) Will this proposed change, at its maximum allowed rate of use, likely result in an increase in interference with **another surface water source**?  
☒ Yes ☐ No Comments: The proposed APOAs, BENT 55224 and BENT 55321 are located ~650 ft and ~2,000 ft south of Frazier creek, respectively, whereas the authorized POA, BENT 2588 is situated ~1,150 ft north of the creek. Due to its shorter intervening distance, the proposed APOA, BENT 55224 is more likely to increase interference with Frazier Creek.
- b) If yes, at its maximum allowed rate of use, what is the expected change in degree of interference with any **surface water sources** resulting from the proposed change?  
Stream: Frazier Creek ☒ Minimal ☐ Significant  
Provide context for minimal/significant impact: In this area, the Willamette Aquifer is overlain by ~20-30 ft of the Willamette Silt Unit (WSU). Frazier Creek is partially incised into the WSU and appears to be underlain by ~15-20 ft of low-permeability WSU sediments. Given the confined nature of the aquifer and the presence of this low-permeability sequence, interference with surface water sources is assumed to be minimal.
7. For SW-GW transfers, will the proposed change in point of diversion affect the surface water source similarly (as per OAR 690-380-2130) to the authorized point of diversion specified in the water use subject to transfer?  
☐ Yes ☐ No Comments: \_\_\_\_\_
8. What conditions or other changes in the application are necessary to address any potential issues identified above: \_\_\_\_\_
9. Any additional comments: \_\_\_\_\_

**References:**

Pumping test reports: BENT 980

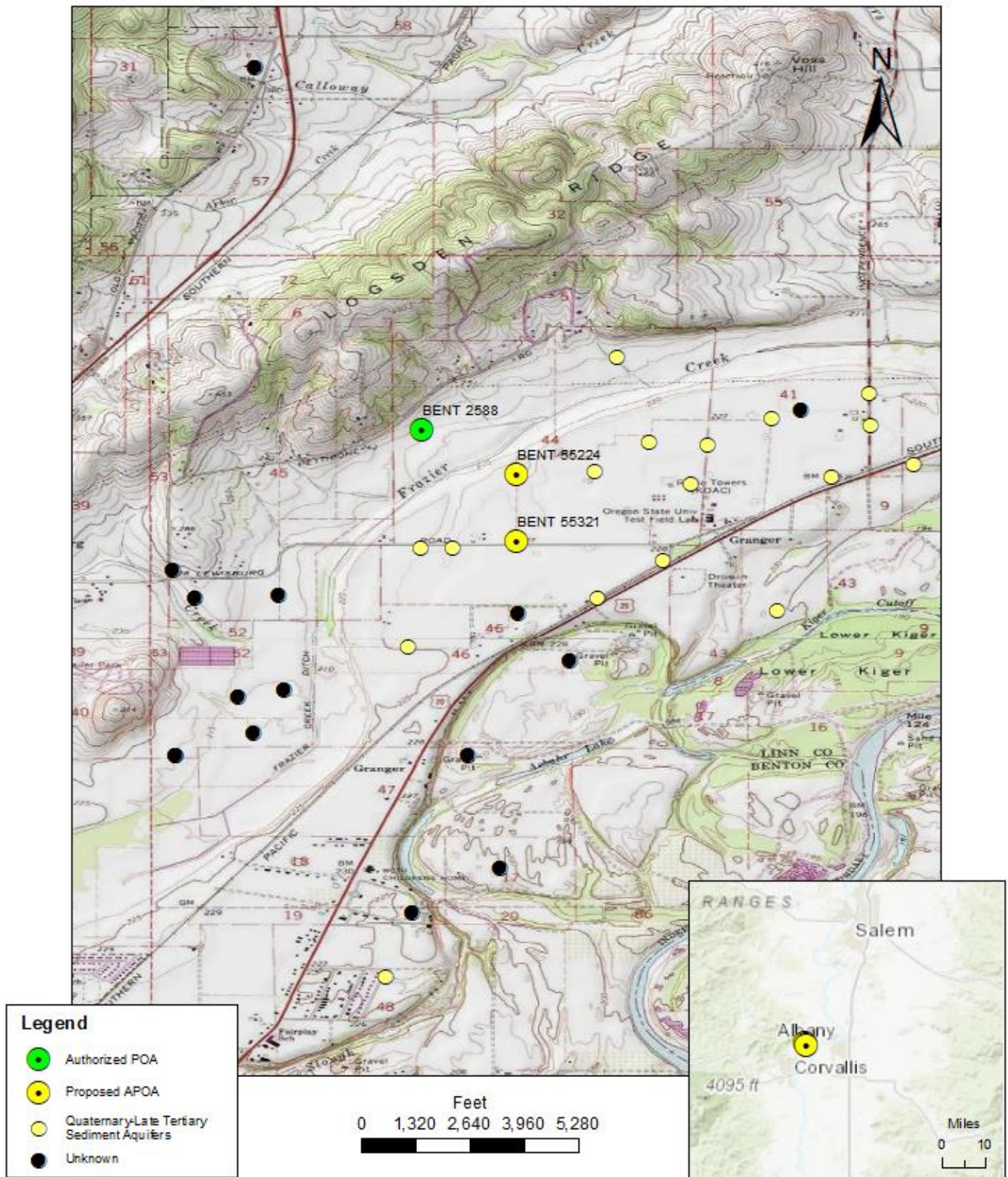
Conlon, T.D., Wozniak, K.C., Woodcock, D., Herrera, N.B., Fisher, B.J., Morgan, D.S., Lee, K.K., and Hinkle, S.R., 2005, Ground-water hydrology of the Willamette Basin, Oregon, Scientific Investigations Report 2005-5168: U. S. Geological Survey, Reston, VA.

Gannett, M.W. and Caldwell, R., 1998, Geologic framework of the Willamette Lowland aquifer system, Oregon and Washington, Professional Paper 1424-A, 32 p: U. S. Geological Survey, Reston, VA.

Theis, C.V., 1935, The relation between the lowering of the piezometric surface and the rate and duration of discharge of a well using groundwater storage, American Geophysical Union Transactions, vol. 16, p. 519-524.

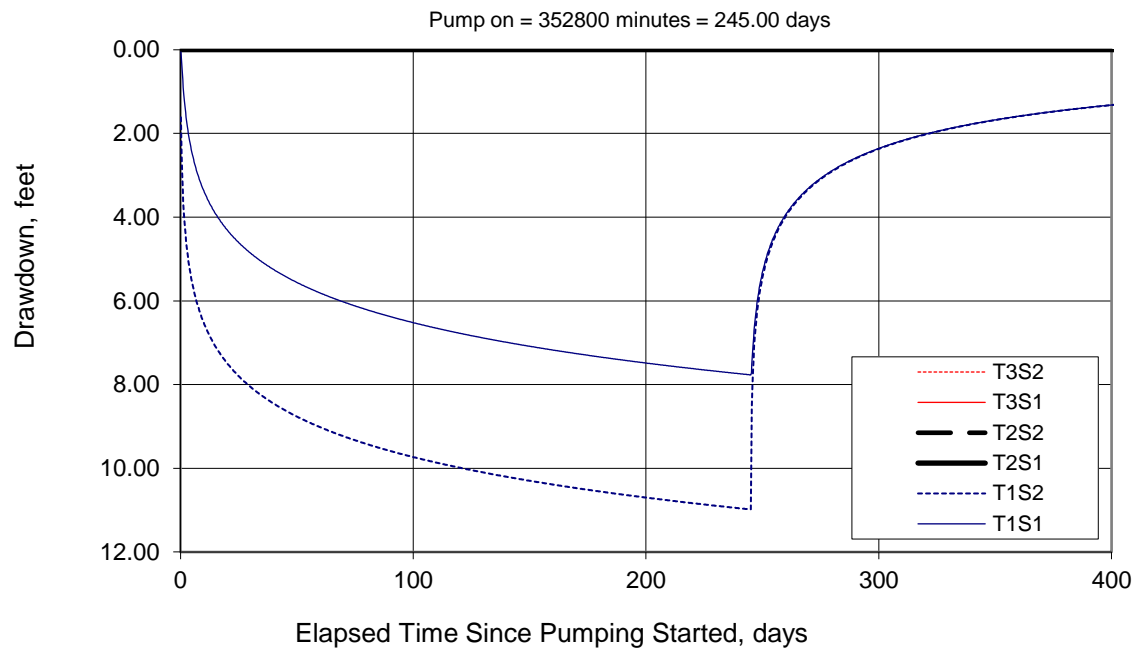
## Location Map:

T-14663



**Well Interference Analysis (Theis, 1935):**

Theis Drawdown and Recovery at BENT 55423 from pumping at APOA, BENT 55321



Radial distance,  $r = 1150$  ft [approximate distance from APOA, BENT 55321 to BENT 55423]

Pumping time,  $t_{\text{pump}} = 245$  days [irrigation season]

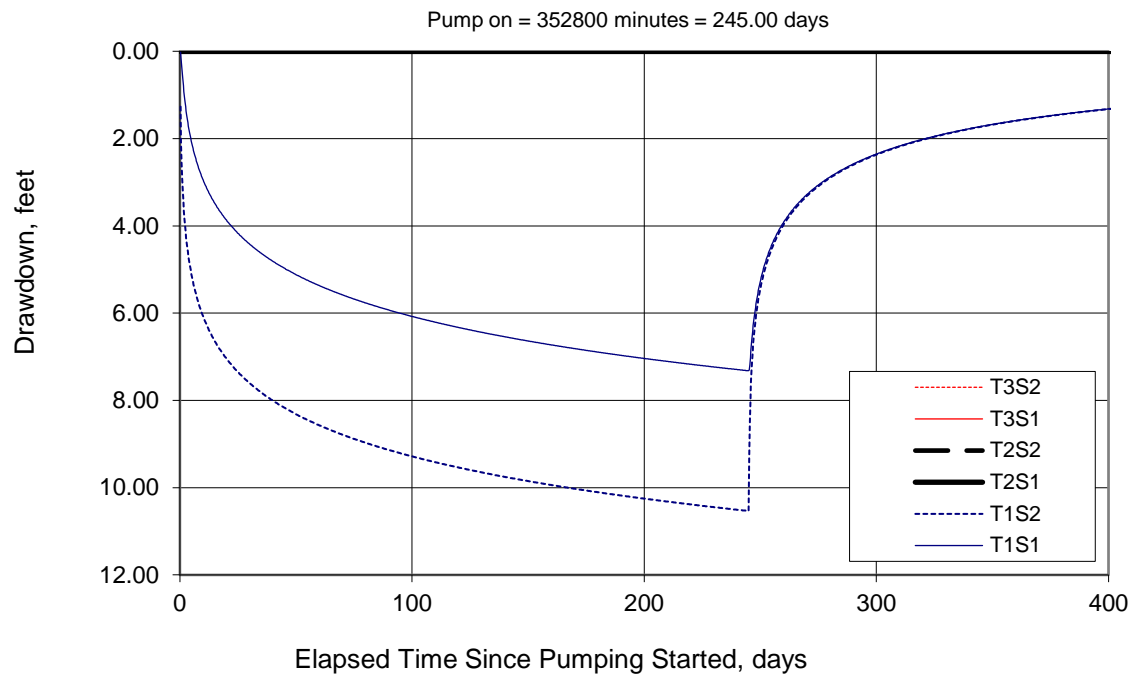
Pumping rate,  $Q = 0.38$  cfs [max rate under Certificate 5028]

Transmissivity:  $T1 = 1.870$  ft<sup>2</sup>/day [pumping test report BENT 980]

Storativity:  $S1 = 0.003$ ;  $S2 = 0.0003$  [Conlon et al., 2005]



Theis Drawdown and Recovery at BENT 2544 from pumping at APOA, BENT 55224



Radial distance,  $r = 1,350$  ft [approximate distance from APOA, BENT 55224 to BENT 2544]

Pumping time,  $t_{\text{pump}} = 245$  days [irrigation season]

Pumping rate,  $Q = 0.38$  cfs [max rate under Certificate 5028]

Transmissivity:  $T1 = 1.870$  ft<sup>2</sup>/day [pumping test report BENT 980]

Storativity:  $S1 = 0.003$ ;  $S2 = 0.0003$  [Conlon et al., 2005]