

Groundwater Transfer Review Summary Form

Transfer/PA # T- 14712

GW Reviewer Grayson Fish Date Review Completed: 9/23/2025

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-14712

Applicant Name: Moore Sisters Farm, LLC

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

Reviewer(s): Grayson Fish

Date of Review: 9/23/2025

Date Returned to WRSD: 9/23/2025

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: The application states: "The property has been divided into multiple ownerships. We wish to construct a second well on our ownership to irrigate the authorized acres on our property. The existing well will continue to source the irrigated area to the north and west of our ownership, belonging to my/our two sons/brothers."

The applicant requests an additional point of appropriation modification for GR-1960. However, given that Table 2 of the application notes that From-POA Well 1 (MARI 295) will no longer be used as a POA for the southern 60.65 acres and the proposed To-POA Well 2 will be the sole source of water from those lands, the appropriate modifications appear to be Point of Appropriation and Place of Use as noted on this review form.

2. Will the proposed POA develop the same aquifer (source) as the existing authorized POA?
☒ Yes ☐ No Comments: Both the authorized From-POA Well 1 and the proposed construction of To-POA Well 2 will develop water from the alluvial aquifer system (Gannett and Caldwell, 1998).
3. a) Is the existing authorized POA subject to a water level decline condition?
☐ Yes ☒ No Comments: GR-1960 does not include a water level decline condition.
- 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: N/A

4. a) Is there more than one source developed under the right (e.g., basalt and alluvium)?
☐ Yes ☒ No Comments: The authorized From-POA Well 1 (MARI 295) only produces water from the alluvial aquifer system.
- 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.): N/A
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 proposed To-POA Well 2 will be closer to authorized POAs associated with Permit G-15228, GR-1999 and Certificates 60707, 79418 and 80433 located to the south of the authorized From-POA Well 1. MARI 53703 is the closest authorized POA for Permit G-15228 and Certificate 79418 and is located ~800 feet south of the proposed To-POA while the From-POA (MARI 295) is ~2,500 feet north of MARI 53703. Moving use closer to MARI 53703 is likely to result in an increase in interference with that well.
- 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: The maximum allowable rate of use from proposed To-POA Well 2 would be ~0.5 cfs ($[1.27 \text{ cfs} / 154.64 \text{ Acres}] * 60.65 \text{ Acres} = 0.50 \text{ cfs}$). Potential interference with MARI 53703 due to the proposed change was analyzed using the Theis (1935) solution for drawdown in a confined aquifer (see attached Well Interference Analysis). Results of the analysis indicate that the proposed change is unlikely to injure MARI 53703 or similar 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 To-POA is ~7,100 feet north-northwest of Senecal Creek whereas the From-POA is ~8,800 feet north-northwest of Senecal Creek. The reduction in distance between the To-POA and Senecal Creek compared to the From-POA will likely result in an increase in interference with Senecal 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: Senecal Creek ☒ Minimal ☐ Significant
Provide context for minimal/significant impact: While the pumping from the proposed To-POA is likely to increase interference with Senecal Creek, the presence of thick layers of fine grained sediments between the sands and gravel of the target aquifer and the overlying stream beds as well as the distance to the Creek would limit the potential for acute interference with Senecal Creek. The expected degree in change in interference is likely 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: N/A
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: MARI 358, 50008, 56906, 56999

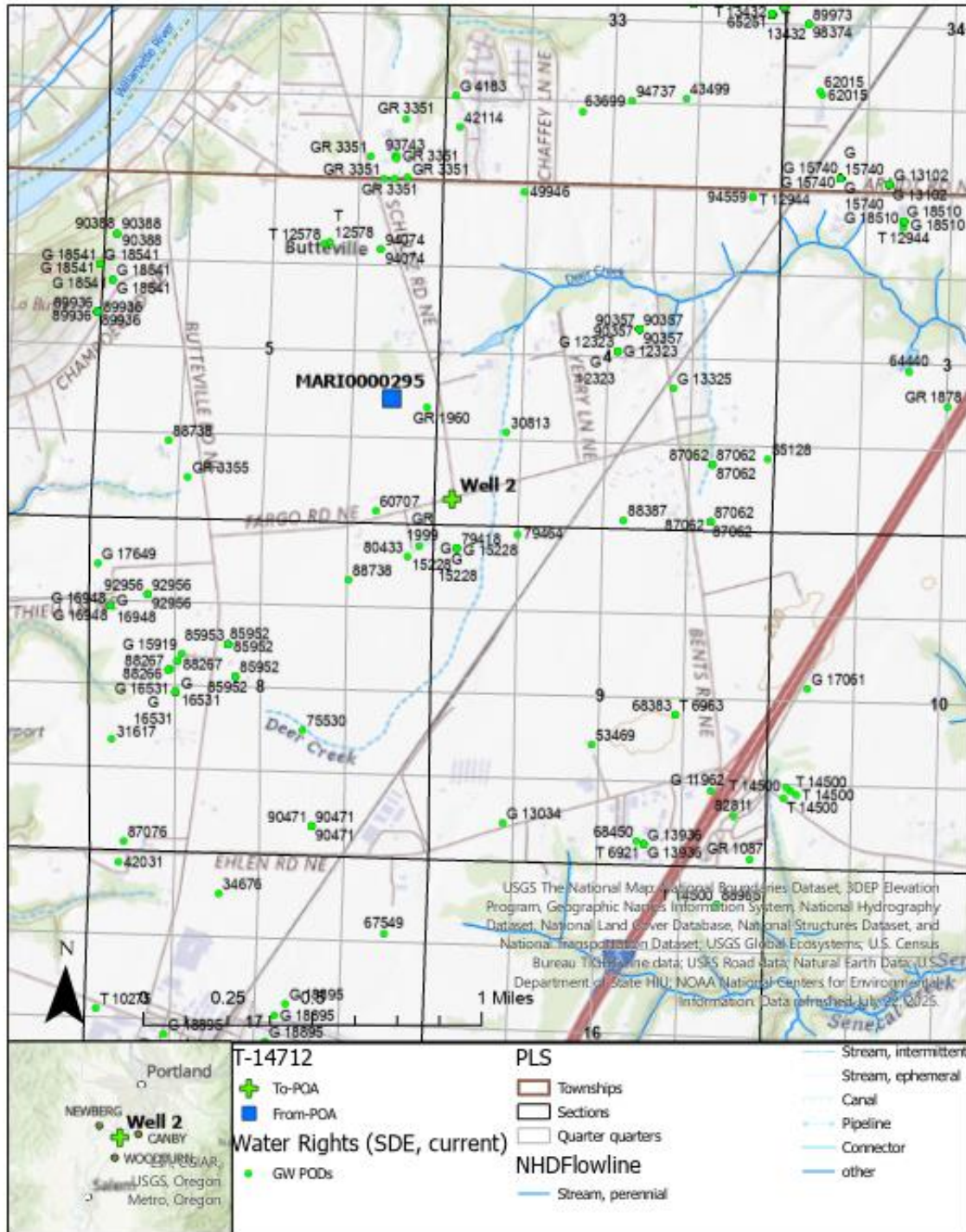
Conlon, T.D., Wozniak, K.C., Woodcock, D., Herrera, N.B., Fisher, B.J., Morgan, D.S., Lee, K.K., and Hinkle, S.R., 2005, Ground-water hydrology of the Willamette Basin, Oregon, Scientific Investigations Report 2005-5168: U. S. Geological Survey, Reston, VA.

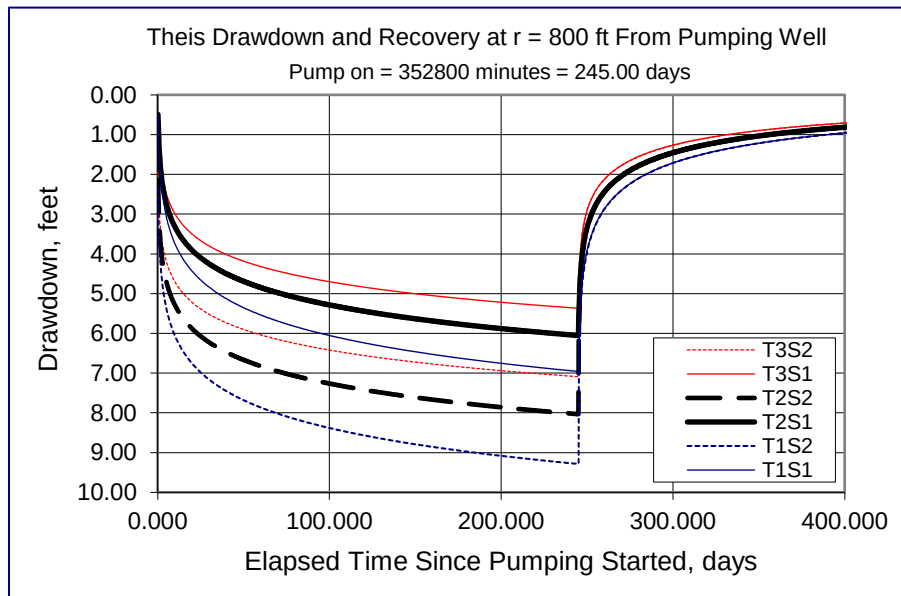
Gannett, M.W. and Caldwell, R., 1998, Geologic framework of the Willamette Lowland aquifer system, Oregon and Washington, Professional Paper 1424-A, 32 p: U. S. Geological Survey, Reston, VA.

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.

Well Location Map

T-14712



Well Interference Analysis (Theis, 1935)

Radial distance, $r = 530$ ft [approximate distance from To-POA (MARI 68707) to MARI 71663]

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

Pumping rate, $Q = 0.5$ cfs [max rate for proposed Well 2]

Transmissivity: $T1 = 3,400$ ft²/day; $T2 = 4,000$ ft²/day; $T3 = 4,600$ ft²/day [pumping test reports]

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