

Groundwater Transfer Review Summary Form

Transfer/PA # T- 14755

GW Reviewer Grayson Fish Date Review Completed: 11/6/2025

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-14755

Applicant Name: Thomas E. Larson

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

Reviewer(s): Grayson Fish

Date of Review: 11/6/2025

Date Returned to WRSD: 11/6/2025

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 purpose of the permit amendment is to “Add 4 well locations to Permit G-18838.”

The applicant proposes to add four APOAs to groundwater Permit G-18838 to achieve the rate authorized by the permit that has not been met by the single authorized POA Well #1 (JACK 65810). The authorized POA and proposed APOA are summarized in the table below:

POA Number	Well Built?	Well Report ID	Total well Depth (feet)	Seal Interval (feet)
#1 (Authorized)	Yes	JACK 65810	460	0 - 18
#2 (Proposed)	Yes	JACK 30801	216	0 - 38
#3 (Proposed)	No	--	200 - 400	0 - 40
#4 (Proposed)	No	--	200 - 400	0 - 40
#5 (Proposed)	No	--	200 - 400	0 - 40

2. Will the proposed POA develop the same aquifer (source) as the existing authorized POA?
☒ Yes ☐ No Comments: The well report for authorized POA Well #1 (JACK 65810) indicates that the well sources water from metasedimentary fractured bedrock. The well report for proposed APOA Well #2 (JACK 30801) also indicates that the well sources water from metasedimentary fractured bedrock. Based on the location and provided construction details for proposed APOA Wells #3, #4 and #5, it is likely that those wells will also source water from metasedimentary fractured bedrock.
3. a) Is the existing authorized POA subject to a water level decline condition?
☒ Yes ☐ No Comments: Authorized POA Well #1 (JACK 65810) is subject to a water level decline condition under Permit G-18838. The permit states the following:
“The permittee shall report an initial March static water level measurement once well construction is complete and annual measurements thereafter. Annual measurements are required whether or not the well is used. The first annual measurement will establish a reference level against which future measurements will be compared. However, the Director may establish the reference level based on an analysis of other water-level data.”
Additionally, Permit G-18838 states the following:
“The water user shall discontinue use of, or reduce the rate or volume of withdrawal from, the well(s) if any of the following events occur:
A. Annual water-level measurements reveal an average water-level decline of three or more feet per year for five consecutive years; or
B. Annual water-level measurements reveal a water-level decline of 15 or more feet in fewer than five consecutive years; or
C. Annual water-level measurements reveal a water-level decline of 25 or more feet; or
D. Hydraulic interference leads to a decline of 25 or more feet in any neighboring well with senior priority.”
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: Well #1 (JACK 65810) was completed on June 1, 2023. March static water levels have not been submitted from this well for 2024 or 2025 despite the requirements laid out in Permit G-18838. Due to the lack of static water level measurements, it is not possible to evaluate if the permit decline condition for Well #1 has been exceeded.
4. a) Is there more than one source developed under the right (e.g., basalt and alluvium)?
☐ Yes ☒ No Comments: Only one source of water is developed under Permit G-18838.
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 well log for Well #1 (JACK 65810) notes a well yield of 4 gpm. Given that the single authorized POA Well #1 is unable to satisfy the 80 gpm rate authorized by Permit G-18838, and the intent of the proposed APOAs is to reach the authorized rate, the changes proposed by this permit amendment will result in a larger volume/rate of groundwater pumped than is currently occurring. Increasing the volume/rate of groundwater extracted is likely to result in an increase in interference with nearby groundwater users such as exempt wells located 2,000 to 5,000 feet to the south, west and north of the proposed APOAs.

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: Due to the nature of fractured bedrock aquifers, it can be difficult to predict the location and magnitude of acute interference between groundwater users. In general, acute interference in fractured bedrock aquifers is limited in aerial extent and it is unlikely that another groundwater right would not receive the water to which it is legally entitled. Additionally, permit G-18838 includes a condition intended to protect senior groundwater users from hydraulic interference of 25 feet or more.

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: As noted in section 5a, the changes proposed by this permit amendment will result in a larger volume/rate of groundwater to be extracted than is currently occurring from the single, rate-limited, authorized POA. The additional volume extracted will result the capture of more groundwater that would have otherwise discharged to hydraulically connected surface water such as Coleman and Anderson Creeks as well as the unnamed springs mapped near the APOAs.

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: Coleman Creek

☒ Minimal ☐ Significant

Stream: Anderson Creek

☒ Minimal ☐ Significant

Provide context for minimal/significant impact: Given the relatively low authorized rate of 80 gpm, the distance (4,000 to 5,000 feet) to nearby creeks, the absence of PODs on the unnamed springs, and the low transmissivity of fractured bedrock aquifers, it is likely that the increase in interference with surface water sources would 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: Metering, groundwater use and static water level permit conditions contained in Permit G-18838 should be extended to all APOAs associated with this permit amendment if approved.

9. Any additional comments: The applicant should begin collecting and reporting March static water levels in authorized Well #1 to allow a reference level to be determined to evaluate permit decline conditions as required by Permit G-18838. If this permit amendment is approved, static water level collection and reporting should begin in the following March for Well #2 (JACK 30801). Static water level collection and reporting should begin for proposed wells #3, #4 and #5 in the March immediately following their construction. Additionally, no water use reporting has occurred under this permit since 2022 and should be resumed to remain in compliance with Permit G-18838.

T-14755

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