

Groundwater Transfer Review Summary Form

Transfer/PA # T- 14666

GW Reviewer Travis Brown Date Review Completed: 1/22/2026

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-14666

Applicant Name: DNJ, LLC

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

Reviewer(s): Travis Brown

Date of Review: 1/22/2026

Date Returned to WRSD: 1/23/2026

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 to change the POU and POA for 46.39 acres of Claim GR-3558, which claims 0.4902 cfs from one well ("Pump Well 1" / BENT 2659) for Irrigation of 93.29 acres. The proposed change would transfer 0.2438 cfs of the total rate (and corresponding acreage) to proposed POA "Well 1" (BENT 55321) and "Well 2" (BENT 55224). NOTE: The proposed To-POA wells are also proposed APOA wells in T-14663. This transfer (T-14666) will be evaluated assuming the proposed To-POA wells will pump at the combined rates proposed in T-14663 and T-14666. This is also a long-distance transfer, with the claimed From-POA being ~2 miles from the nearest proposed To-POA, "Well 1" (BENT 55321).
2. Will the proposed POA develop the same aquifer (source) as the existing authorized POA?
 Yes No Comments: All the claimed and proposed wells develop the Willamette alluvial aquifer (Gannett and Caldwell, 1998).
3. a) Is the existing authorized POA subject to a water level decline condition?
 Yes No Comments: Groundwater claim.
 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: _____

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 are substantially closer to neighboring wells BENT 55423 (authorized POA on Permit G-17980; 146.14 acres, 1.83 cfs) and BENT 2544 (authorized POA on Certificate 33903; 230.3 acres, 0.9 cfs). Proposed To-POA "Well 1" (BENT 55321) is ~1,090 ft east of neighboring well BENT 55423 (Permit G-17890). Proposed To-POA "Well 2" (BENT 55224) is ~1,390 ft west of neighboring well BENT 2544 (Certificate 33903). The claimed From-POA, by contrast, is ~2 miles to the southwest of all these wells. The closer proximity will very likely result in an increase in interference with these wells and their associated 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: Interference with neighboring wells from pumping the proposed To-POA wells was assessed using the Theis (1935) solution for drawdown in a confined aquifer. Hydraulic parameters used for the analysis were derived from regional data and studies (Pumping Test Reports; Conlon et al., 2005; McFarland and Morgan, 1996; Woodward et al., 1998). Results of the analysis indicate that the proposed change is unlikely to result in injury of neighboring wells.

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 would be closer to a downstream, perennial reach of Frazier Creek which is hydraulically connected to the alluvial aquifer.

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

Stream: Willamette River Minimal Significant

Provide context for minimal/significant impact: There are no downstream rights claiming Frazier Creek as source; therefore, there is no risk of injury to other water rights from an increase in seasonal interference with this reach of Frazier Creek. The proposed To-POA are further away from the Willamette River and associated sloughs and oxbow lakes, which will not likely result in an increase in interference with these surface water bodies.

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

Pump Test Reports: BENT 980, 54843, 55422, 55423, 55451

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.

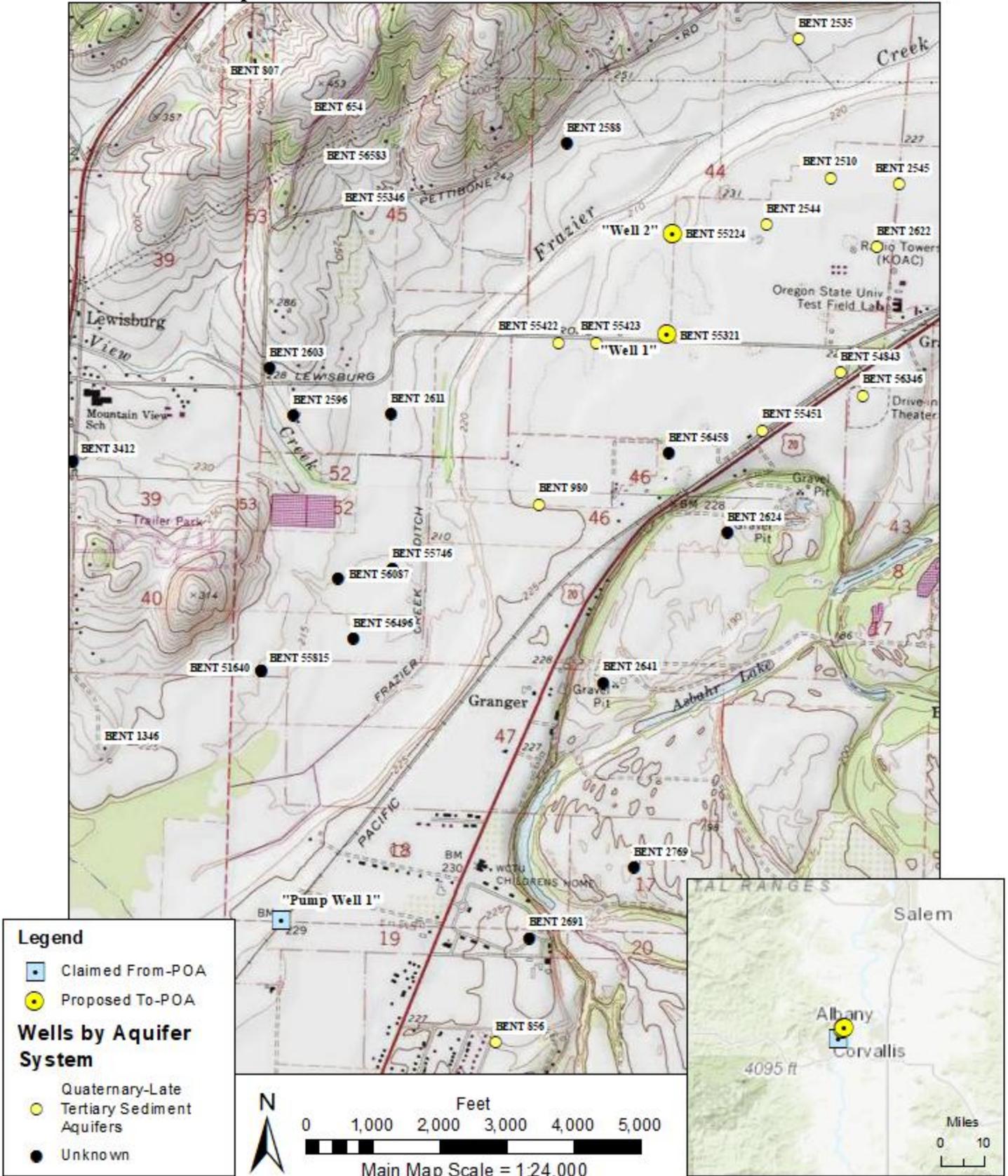
McFarland, W.D., and Morgan, D.S., 1996, *Description of the Ground-Water Flow System in the Portland Basin, Oregon and Washington*, Water Supply Paper 2470-A, 58 p: U. S. Geological Survey, Reston, VA.

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.

Woodward, D.G., Gannett, M.W., and Vaccaro, J.J., 1998, *Hydrogeologic framework of the Willamette Lowland aquifer system, Oregon and Washington*: U.S. Geological Survey Professional Paper 1424-B, 82 p.

Well Location Map

T-14666

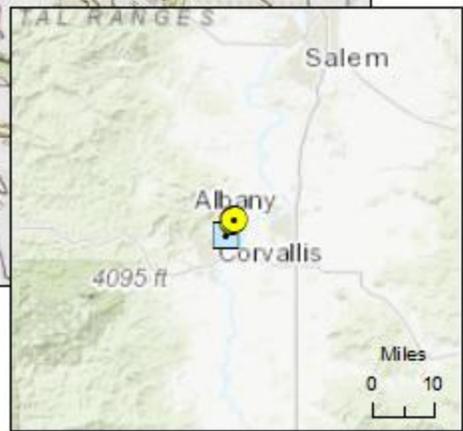
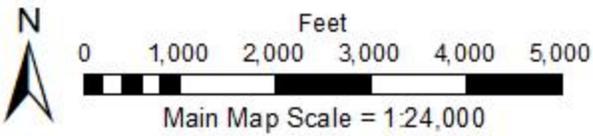


Legend

- Claimed From-POA
- Proposed To-POA

Wells by Aquifer System

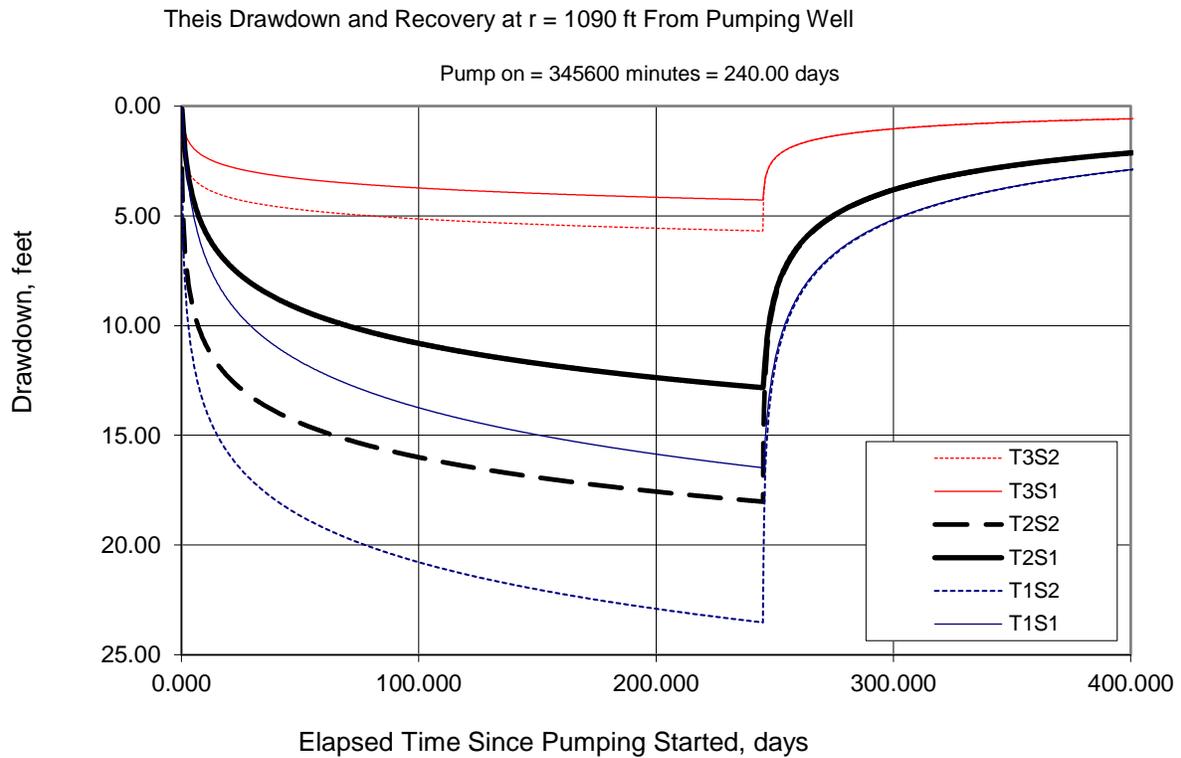
- Quaternary-Late Tertiary Sediment Aquifers
- Unknown



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Well Interference Analysis

Theis (1935) Drawdown and Recovery at **BENT 55423** from pumping at To-POA **BENT 55321**



Radial distance, r = 1,090 ft [approximate distance from To-POA, BENT 55321 to BENT 55423]

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

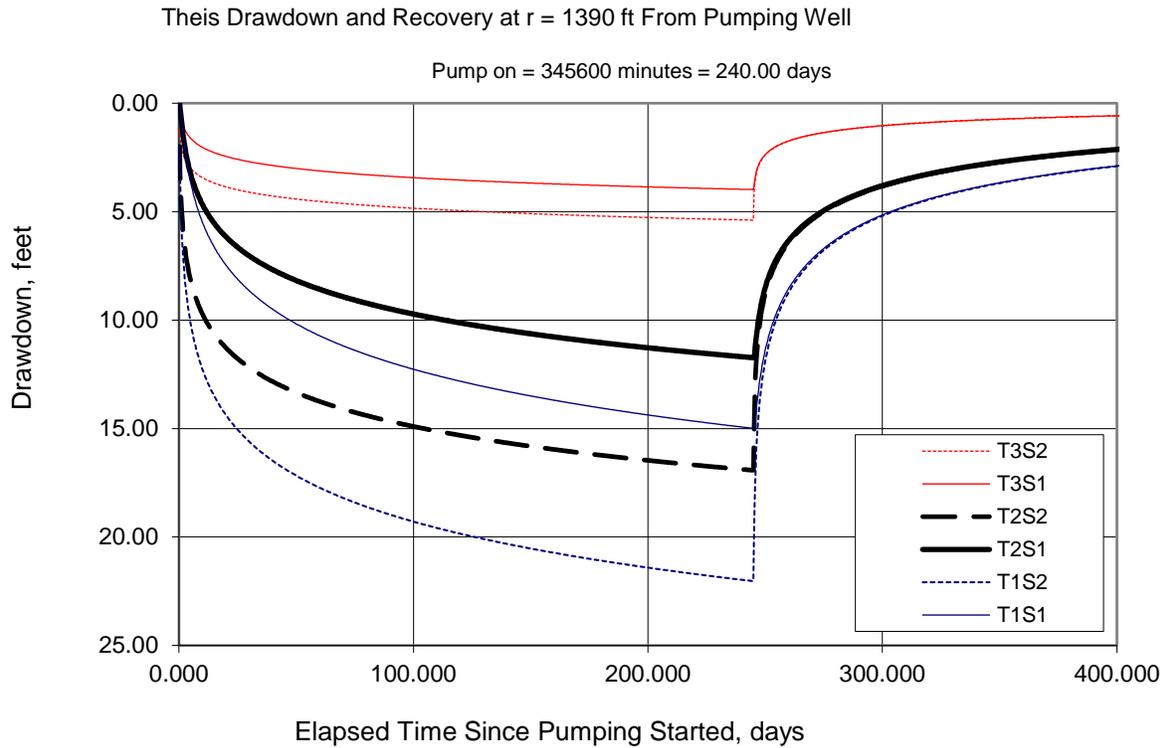
Pumping rate, Q = 0.6238 cfs [max rate combined rate under T-14663 and T-14666]

Transmissivity: T1=1,400 ft²/day | T2=1,900 ft²/day | T3=7,000 ft²/day [pumping test reports]

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

SWL	5.10	ft bls	Permit Condition Measurement, 3/20/2025
Well Bottom	80	ft bls	BENT 55423 (fully penetrating per Gannett and Caldwell, 1998)
Available Water Column	75	ft	Well bottom-SWL (approximate)
Pump Height Above Bottom	5	ft	Estimate
NPSHa	5	ft	Estimate
Drawdown	23	ft	Estimated from pumping test for BENT 55423
Minimum Water Column	33	ft	Estimated Drawdown + NPSHa + Pump Height
Injury	42	ft	Available Water Column-Minimum Water Column

Theis (1935) Drawdown and Recovery at **BENT 2544** from pumping at To-POA **BENT 55224**



Radial distance, r = 1,090 ft [approximate distance from To-POA, BENT 55321 to BENT 55423]

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

Pumping rate, Q = 0.6238 cfs [max rate combined rate under T-14663 and T-14666]

Transmissivity: T1=1,400 ft²/day | T2=1,900 ft²/day | T3=7,000 ft²/day [pumping test reports]

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

SWL	18.53	ft bls	State Obs Well Measurement, 4/16/2025
Well Bottom	103	ft bls	BENT 2544 (fully penetrating per Gannett and Caldwell, 1998)
Available Water Column	84	ft	Well bottom-SWL (approximate)
Pump Height Above Bottom	5	ft	Estimate
NPSHa	5	ft	Estimate
Drawdown	32	ft	Estimated from pumping test for BENT 55423
Minimum Water Column	42	ft	Estimated Drawdown + NPSHa + Pump Height
Injury	42	ft	Available Water Column-Minimum Water Column