

Groundwater Transfer Review Summary Form

Transfer/PA # T- 14740

GW Reviewer Stacey Garrison Date Review Completed: 12/5/2025

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.



Oregon Water Resources Department
 725 Summer Street NE, Suite A
 Salem, Oregon 97301-1271
 (503) 986-0900
 www.wrd.state.or.us

Ground Water Review Form:

- Water Right Transfer**
- Permit Amendment**
- GR Modification**
- Other**

Application: T-14740

Applicant Name: Pegg Industries, LLC

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

Reviewer(s): Pegg Industries, LLC

Date of Review: 12/5/2025

Date Reviewed by GW Mgr. and Returned to WRSD: JTI 3/13/26

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 changes to two certificates: on **Certificate 36333**, rearrange POU and add APOA POA 2/Well #2 (**POLK 3885**); on **Certificate 98499**, rearrange POU and change POA to POA 2/Well #2 (**POLK 3885**). The subject transfer is concurrent with new water right application **G-19516** on POA 2/Well #2 (**POLK 3885**) for irrigation of 93.6 ac at 0.74 cfs (332 gpm) and maximum annual volume 234 AF. This transfer will address POU layering resulting from **G-19516**. **Certificate 36333** authorizes POA 1/Well#1 (**POLK 3887**) to irrigate 53.6 acres at 0.43 cfs (193 gpm) and a maximum annual volume of 134 AF. **Certificate 98499** authorizes POA 1/Well#1 (**POLK 3887**) to irrigate 54.9 acres at 0.69 cfs (310 gpm) and a maximum annual volume of 137.25 AF. The total combined rate will be used and is shown in the table below.

Rates and Duties		POA 2/Well#2 (POLK 3885)
POU (ac)	This transfer, T-14740/Certificate 36333	53.6 ac
	This transfer, T-14740/Certificate 98499	54.9 ac
	Application G-19516	93.6 ac
	Total	202.1 ac
Authorized duty (AF/year)	This transfer, T-14740/Certificate 36333	134 AF
	This transfer, T-14740/Certificate 98499	137.25 AF
	Application G-19516	234 AF
	Total	505.25 AF
Flow rate CFS (gpm)	This transfer, T-14740/Certificate 36333	0.43 cfs (193 gpm)
	This transfer, T-14740/Certificate 98499	0.69 cfs (310 gpm)
	Application G-19516	0.74 cfs (332 gpm)
	Total	1.86 cfs (835 gpm)

2. Will the proposed POA develop the same aquifer (source) as the existing authorized POA?
 - Yes No Comments: The authorized POA, POA 1/Well#1 (POLK 3887), uses the sand a gravel aquifer located approximately between 20 and 40 ft bls [133 to 153 ft amsl] and the proposed APOA, POA 2/Well #2 (POLK 3885), uses the same alluvial aquifer.

3. a) Is the existing authorized POA subject to a water level decline condition?
 - Yes No Comments: _____
 - 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: Only the alluvial source is developed.
 - 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 APOA, POA 2/Well #2 (POLK 3885), is closer to POLK 71 than the authorized POA, POA 1/Well#1 (POLK 3887). POLK 71 is a POA on Certificate 97872 with priority date 8/23/1990. The reduced intervening distance is anticipated to result in an increase in interference with POLK 71.
 - 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: It is not likely that the pumping by POA 2/ proposed transfer will POA 2/Well #2 (POLK 3885) will result in POLK 71 not receiving the water to which it is legally entitled, see attached Theis Drawdown and Injury analyses.

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 APOA, POA 2/Well #2 (POLK 3885), is closer to the Willamette River than the authorized POA, POA 1/Well#1 (POLK 3887). The reduced intervening distance is anticipated to result in an increase in interference with the Willamette River.

- 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: Willamette River Minimal Significant

Provide context for minimal/significant impact: The reduced intervening distance is relatively small compared to the overall distance between the POAs and the surface water source such that there is not a significant difference in the propagation of interference anticipated.

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

Transfer File: T-14740

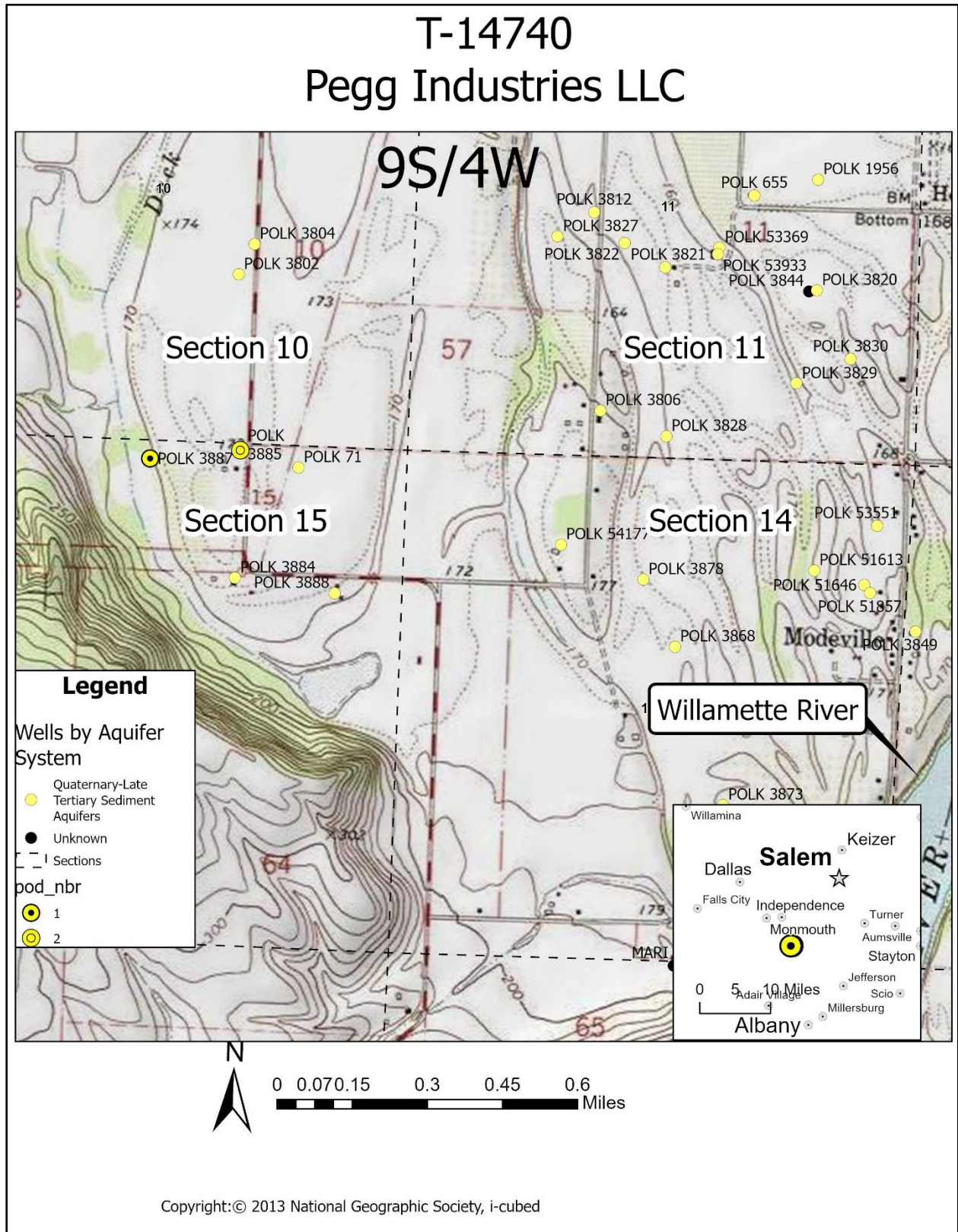
Pumping Test Files: POLK 71

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.

O'Connor, J.E., Sarna-Wojcick, A., Wozniak, K.C., Polette, D.J., Fleck, R.J., 2001, Origin, Extent, and Thickness of Quaternary Geologic Units in the Willamette Valley, Oregon; U.S. Geological Survey, Professional Paper 1620, 51 p.

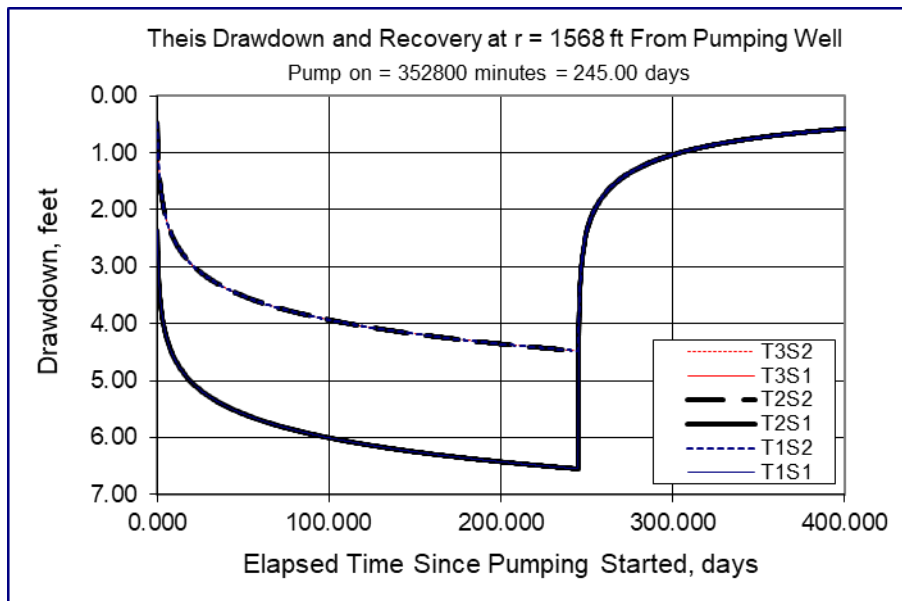
Woodward, D.G., Gannett, M.W., and Vaccaro, J.J., 1998, Hydrogeologic framework of the Willamette Lowland aquifer system, Oregon and Washington: U.S. Geological Survey Professional Paper 1424-B, 82 p.

Map



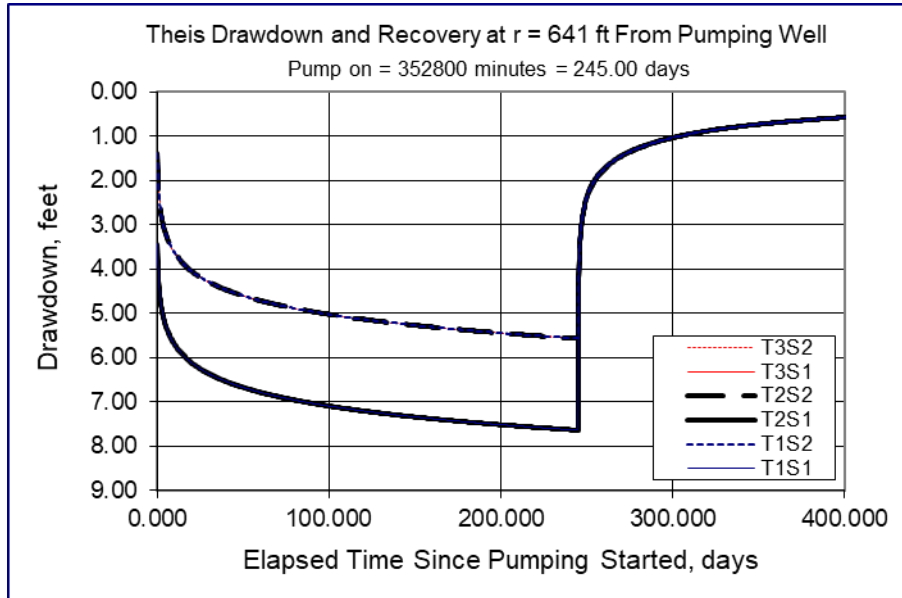
Theis Drawdown Analysis: POA 1/Well#1 (POLK 3887)-POLK 71

Input Data:	Var Name	Scenario 1	Scenario 2	Scenario 3	Units	
Total pumping time	t		245		d	
Radial distance from pumped well:	r		1568		ft	Q conversions
Pumping rate	Q		1.86		cfs	834.77 gpm
Hydraulic conductivity	K	1050	1050	1050	ft/day	1.86 cfs
Aquifer thickness	b		20		ft	111.60 cfm
Storativity	S 1		0.0001			160,704.00 cfd
	S 2		0.003			3.69 af/d
Transmissivity Conversions	T_f2pd	21000	21000	21000	ft2/day	Recalculate
	T_ft2pm	14.5833333	14.5833333	14.5833333	ft2/min	
	T_gpdft	157080	157080	157080	gpd/ft	



Theis Drawdown Analysis: POA 2/Well#2 (POLK 3885)-POLK 71

Input Data:	Var Name	Scenario 1	Scenario 2	Scenario 3	Units	
Total pumping time	t		245		d	
Radial distance from pumped well:	r		641		ft	Q conversions
Pumping rate	Q		1.86		cfs	834.77 gpm
Hydraulic conductivity	K	1050	1050	1050	ft/day	1.86 cfs
Aquifer thickness	b		20		ft	111.60 cfm
Storativity	S 1		0.0001			160,704.00 cfd
	S 2		0.003			3.69 af/d
Transmissivity Conversions	T_f2pd	21000	21000	21000	ft2/day	Recalculate
	T_ft2pm	14.5833333	14.5833333	14.5833333	ft2/min	
	T_gpdft	157080	157080	157080	gpd/ft	



Injury Analysis-POLK 71

SWL	20.42 ft bls	POLK 71 Pump Test, 1/11/2005
Aquifer Bottom	60 ft bls	Gannett & Caldwell 1998
Available Water Column	117 ft	Aquifer bottom-SWL
Pump Height Above Bottom	5 ft	Estimate
NPSHa	5 ft	Estimate
Drawdown	16 ft	POLK 71 Pump Test, 1/11/2005
Minimum Water Column	26 ft	Estimated Drawdown + NPSHa + Pump Height
Injury	91 ft	Available Water Column-Minimum Water Column