

Groundwater Transfer Review Summary Form

Transfer/PA # T- 14815

GW Reviewer James Hootsmans Date Review Completed: 3/12/2026

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.



Oregon Water Resources Department
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 Salem, Oregon 97301-1271
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Ground Water Review Form:

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

Application: T-14815

Applicant Name: Farmland Reserve

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

Reviewer(s): James Hootsmans

Date of Review: 3/12/2026

Date Reviewed by GW Mgr. and Returned to WRSD: 3/12/2026

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: This temporary transfer application proposes to change the places of use (POU) and proposes additional points of appropriation (APOA) to 8 different existing certificates (abbreviated Cert). The certificates with proposed changes are (in ascending number order): **Cert 74762, Cert 80849, Cert 80850, Cert 85124, Cert 87042, Cert 87666, Cert 87667 and Cert 92001.**

Moreover, this transfer pertains to wells that are located in both the Stage Gulch Critical Groundwater Area, Subareas D and H. **Cert 74762, Cert 87042, and Cert 92001 contain wells in Subarea D and Cert 80849, Cert 87666, and Cert 87667 contain wells in Subarea H. Cert 80850 and Cert 85124 contain wells in both Subarea D and Subarea H.** A table of the existing rates, duty and subarea designations is attached.

The proposed changes for each Certificate are listed below:

Certificate 74762: All authorized and proposed wells are in Subarea D
 Authorized POAs – UMAT 1347, UMAT 1341, UMAT 1238, UMAT 1286, UMAT 1294
 Proposed APOAs – UMAT 1282
 Place of use change for 218.7 acres

Certificate 80849: All authorized and proposed wells are in Subarea H
 Authorized POAs – UMAT 54853, UMAT 1329
 Proposed APOAs – UMAT 1326, UMAT 1295, UMAT 1300, UMAT 3010, UMAT 1351
 Place of use change for 231.89 acres

Certificate 80850: Authorized and proposed wells are in both Subarea D and Subarea H
Authorized POAs – UMAT 1282 (Subarea D), UMAT 1300 (Subarea H)
Proposed APOAs – UMAT 1347, UMAT 1341, UMAT 1238, UMAT 1286, UMAT 1294
(Subarea D) and UMAT 54853, UMAT 1329, UMAT 1326, UMAT 1295, UMAT 3010,
UMAT 1351 (Subarea H)
Place of use change for 780.8 acres

Certificate 85124: Authorized and proposed wells are in both Subarea D and Subarea H
Authorized POAs – UMAT 1347, UMAT 1341, UMAT 1238, UMAT 1286, UMAT 1294
(Subarea D), UMAT 1295 (Subarea H)
Proposed APOAs – UMAT 1282 (Subarea D) and UMAT 54853, UMAT 1329, UMAT
1326, UMAT 1300, UMAT 3010, UMAT 1351 (Subarea H)
Place of use change for 660.61 acres of primary irrigation and 349.59 of supplemental
irrigation

Certificate 87042: All authorized and proposed wells are in Subarea D
Authorized POAs – UMAT 1347, UMAT 1341, UMAT 1238, UMAT 1286, UMAT 1294
Proposed APOAs – UMAT 1282
Place of use change for 837.80 acres of primary irrigation and 206.6 acres of supplemental
irrigation

Certificate 87666: All authorized and proposed wells are in Subarea H
Authorized POAs – UMAT 1295, UMAT 1300, UMAT 1326, UMAT 54853
Proposed APOAs – UMAT 1329, UMAT 3010, UMAT 1351
Place of use change for 250 acres

Certificate 87667: All authorized and proposed wells are in Subarea H
Authorized POAs – UMAT 1295, UMAT 1300, UMAT 1326, UMAT 54853
Proposed APOAs – UMAT 1329, UMAT 3010, UMAT 1351
Place of use change for 120.45 acres

Certificate 92001: All authorized and proposed wells are in Subarea D
Authorized POAs – UMAT 1347, UMAT 1341, UMAT 1238, UMAT 1286, UMAT 1294
Proposed APOAs – UMAT 1282
Place of use change for 349.59 acres

2. Will the proposed POA develop the same aquifer (source) as the existing authorized POA?
 Yes No Comments: All of the POAs produce from water-bearing zones in the
Columbia River Basalt aquifer system and are located in subareas D and H of the Stage
Gulch Critical Groundwater Area.

Cert 74762, Cert 87042, and Cert 92001 contain wells in Subarea D and the proposed APOA
would all be in Subarea D. Cert 80849, Cert 87666, and Cert 87667 contain wells in Subarea
H and the proposed APOA would all be in Subarea H.

Cert 80850 and Cert 85124 contain POAs in both Subarea D and Subarea H. The
proposed APOAs are also respectively in either Subarea D or Subarea H. These two
certificates have existing rate restrictions for the authorized POAs. Conditions about
rates per well in each subarea are described below in Section 8

3. a) Is the existing authorized POA subject to a water level decline condition?
 Yes No Comments: None of the authorized POAs are subject to a water level decline condition. All POAs are subject to the Stage Gulch Critical Groundwater Area rules (OAR 690-507).
- 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: NA
4. a) Is there more than one source developed under the right (e.g., basalt and alluvium)?
 Yes No Comments: All authorized POAs and proposed APOAs are constructed in the Stage Gulch Critical Groundwater Area basalt aquifer system either in Subarea D or Subarea H. Each Subarea is considered a separate source. Since the application is proposing changes to 8 certificates, POAs are located in both Subareas, depending on the certificate.
- 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.): As discussed section 2, both Cert 80850 and Cert 85124 contain wells in both Subarea D and Subarea H. The APOAs proposed for those Certificates must not exceed the allowed rate that is currently given to the authorized POAs in the respective Subareas. Section 8 discusses the rate conditions in further detail.
- All POAs would be subject to the Stage Gulch Critical Groundwater Area allocation process in addition to any rates determined as a result of this transfer. The proposed changes may lead to wells that have not previously been allocated water to receive water if the transfer is approved.
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 changes would be using the same total rate of water across more POA in an area all purchased/owned by the applicant. However, UMAT 3010 and UMAT 1351 are significantly closer to other senior water rights in Subarea H. UMAT 3010 is approximately 530 feet away from UMAT 58365, the well on the most senior right in Subarea H. UMAT 3010 and UMAT 1351 are proposed to be added to 5 certificates as part of this temporary transfer.
- 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 potential interference with UMAT 58365 resulting from the proposed change was estimated using the Theis (1935) solution. Results of the analysis indicate the proposed changes are likely to result in injury of UMAT 58365. UMAT 58365 is the senior water right in Subarea H.

Based on the specific capacity estimates for surrounding wells to UMAT 3010, a yield of 3,000 gallons per minute (gpm, ~8.03 CFS) is expected. For the purposes of the analysis, 3000 gpm was used as the conservative approach. In addition, the length of the irrigation season for Stage Gulch (OAR 690-507-0770), March 1 to November 30, was used as the number of days of pumping. Pump test data in surrounding sections for basalt wells ranged between 1500 and 15000 ft²/day for transmissivity. The neighboring UMAT 58365 has over 450 feet of water column since the latest February 2026 measurement. Well yields in the surrounding sections ranged from 10 to 4800 gpm.

The modeled drawdown at 3,000 gpm is up to 375 feet of drawdown. **At max capacity of UMAT 3010, it is unlikely that the senior right will have the water it is legally entitled to at UMAT 58365.**

UMAT 3010 is proposed to be added to up to 5 certificates and there is uncertainty on the total rate that will be pumped (based on lack of historical data), therefore there is a likely chance of significant interference with UMAT 58365. If the APOA is used as proposed across all 5 certificates, it is unlikely that the senior right will have the water it is legally entitled to at UMAT 58365.

It is recommended that UMAT 3010 is removed from the transfer for this application to be approved.

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 authorized POAs and proposed APOAs are cased and sealed far below the nearby surface water bodies.
- 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: _____ Minimal Significant
 Stream: _____ Minimal Significant
 Provide context for minimal/significant impact: N/A
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: **Cert 80850 and Cert 85124 contain POAs in both Subarea D and Subarea H. The proposed APOAs are also respectively in either Subarea D or Subarea H. These two certificates have existing rate restrictions for the authorized POAs.**

Cert 80850 indicates a maximum rate of 2.9 cubic feet per second (CFS) for UMAT 1282 in Subarea D and a maximum rate of 3.04 CFS for UMAT 1300 in Subarea H for a total of 5.94 CFS between the two if the well rates are rotated. To be considered the same source, the proposed APOAs from Subarea D should be limited to the total maximum 2.9 CFS rate of UMAT 1282, and the respective APOAS from Subarea H should be limited to the total 3.04 CFS rate of UMAT 1300 in Subarea H.

Similarly for Cert 85124, a maximum rate of 4.745 CFS is allowed for primary and supplemental irrigation of the authorized POAs in Subarea D (UMAT 1347, UMAT 1341, UMAT 1238, UMAT 1286, UMAT 1294) and a maximum rate of 4.745 CFS for UMAT 1295 in Subarea H for both primary and supplemental irrigation if available. To be considered the same source, the proposed APOAs from Subarea D should be limited to the total maximum 4.745 CFS rate of the Subarea D authorized POAs, and the respective APOAS from Subarea H should be limited to the total 4.745 CFS rate of UMAT 1295 in Subarea H.

9. Any additional comments:

Approval of temporary transfers within the Stage Gulch Critical Groundwater Area complicates the annual task of allocating water to the water users. It is typical that a single flowmeter is installed at each authorized well. Pumping under an approved temporary transfer often results in water authorized under multiple rights of record being recorded by a single flowmeter. Previous allocations were typically based on rough estimates of the proportion of the total water pumped under each of the rights

Several of the wells on this transfer, whether authorized or proposed POAs have compliance issues where OWRD have not been able to get flowmeter data or water levels. These issues mean the wells are not in compliance with Stage Gulch Critical Groundwater Area rules (OAR 690-507-0780). In some cases, the pumps have been pulled and therefore no flowmeters. Should the wells be put into use, the wells would have to become compliant. Here are the list of issues/notes:

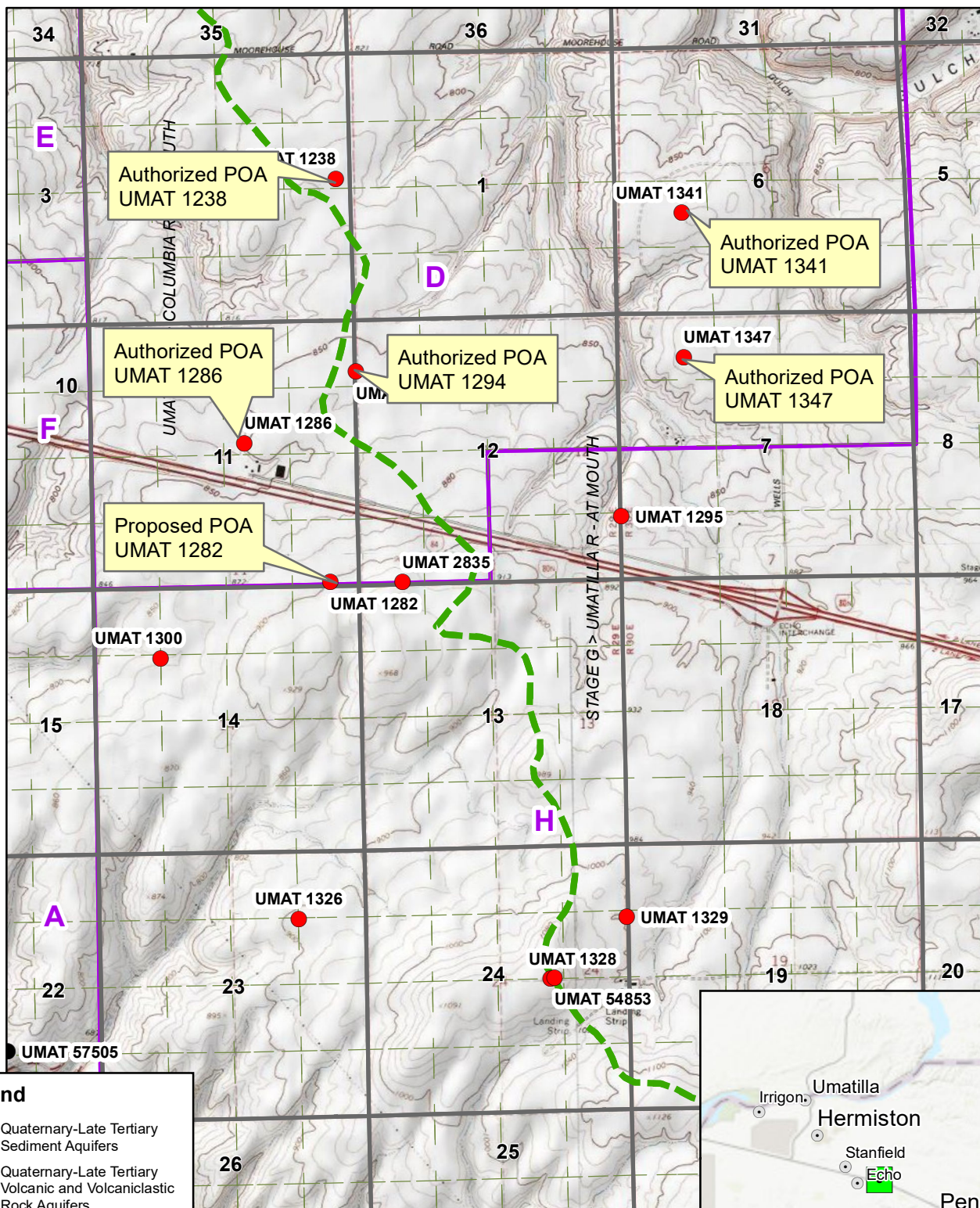
Subarea D

UMAT 1347: Not able to get water level measurement, no flowmeter
UMAT 1341: No Pump, no flowmeter (currently open hole – able to get a measurement)
UMAT 1238: Not able to get water level measurement
UMAT 1286: No Pump, no flowmeter (currently open hole – able to get a measurement)
UMAT 1294: Owner gage for measurement, no issues
UMAT 1282: Not able to get water level measurement

Subarea H

UMAT 54853: Not able to get water level measurement
UMAT 1329: Dry well, no flow meter
UMAT 1326: Not able to get water level measurement
UMAT 1295: Not able to get water level measurement
UMAT 3010: Owner gage for measurement, no access to flowmeter
UMAT 1351: Not able to get water level measurement. Owner lease is ending.
UMAT 1300: Not able to get water level measurement

T14815 Certificates 74762, 87042, and 92001

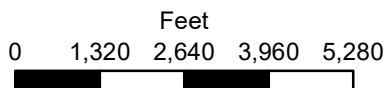
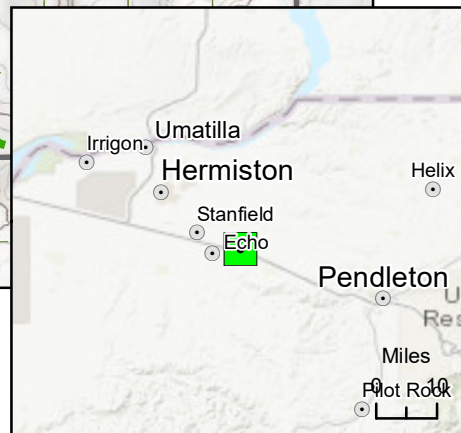


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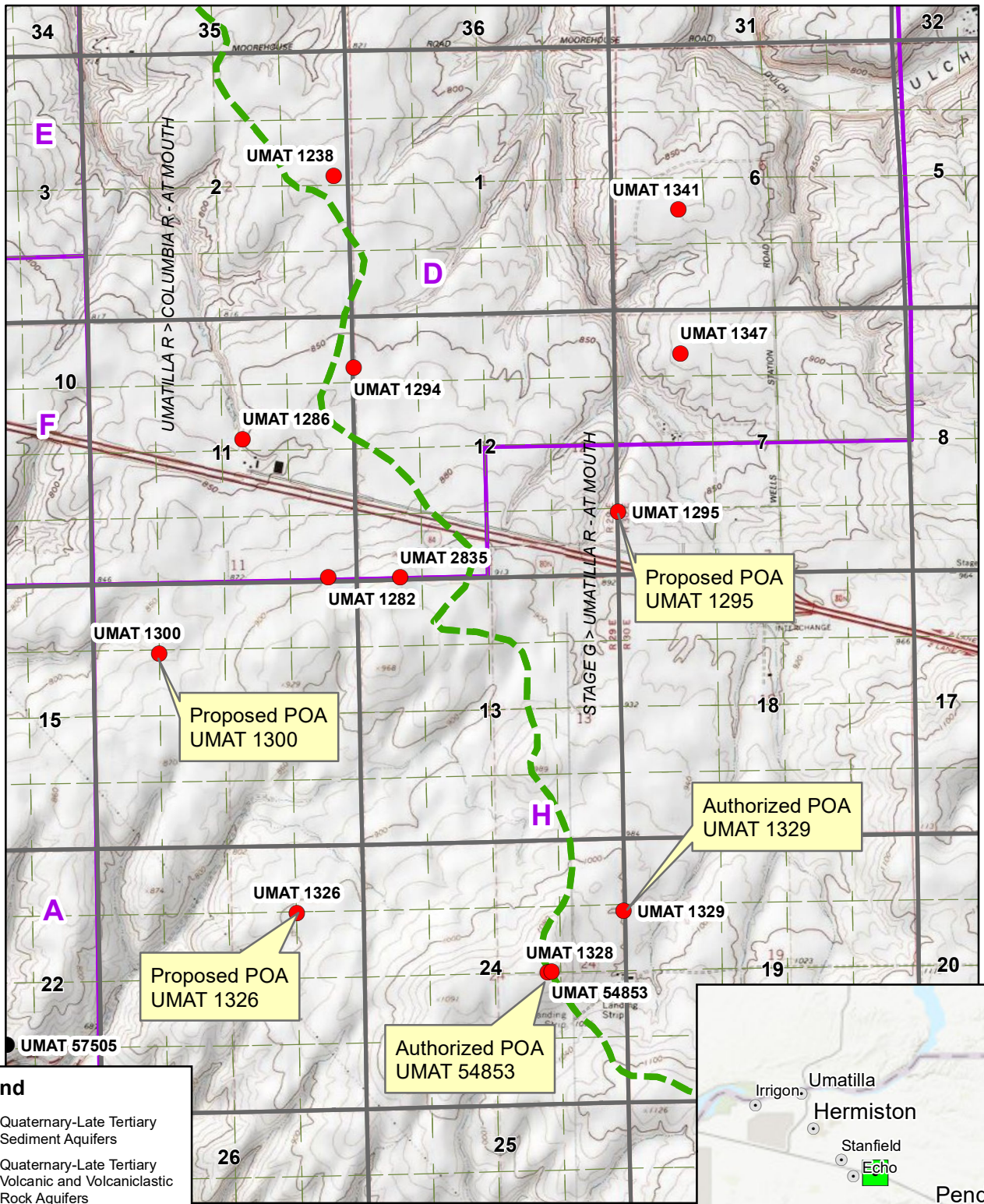
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- Late Tertiary Basalt Aquifers
- Unknown
- GWRA Subareas

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T14815 Certificate 80849

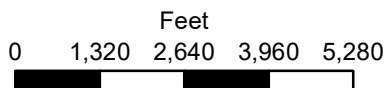
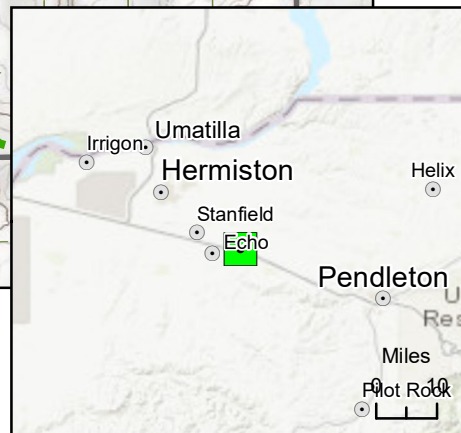


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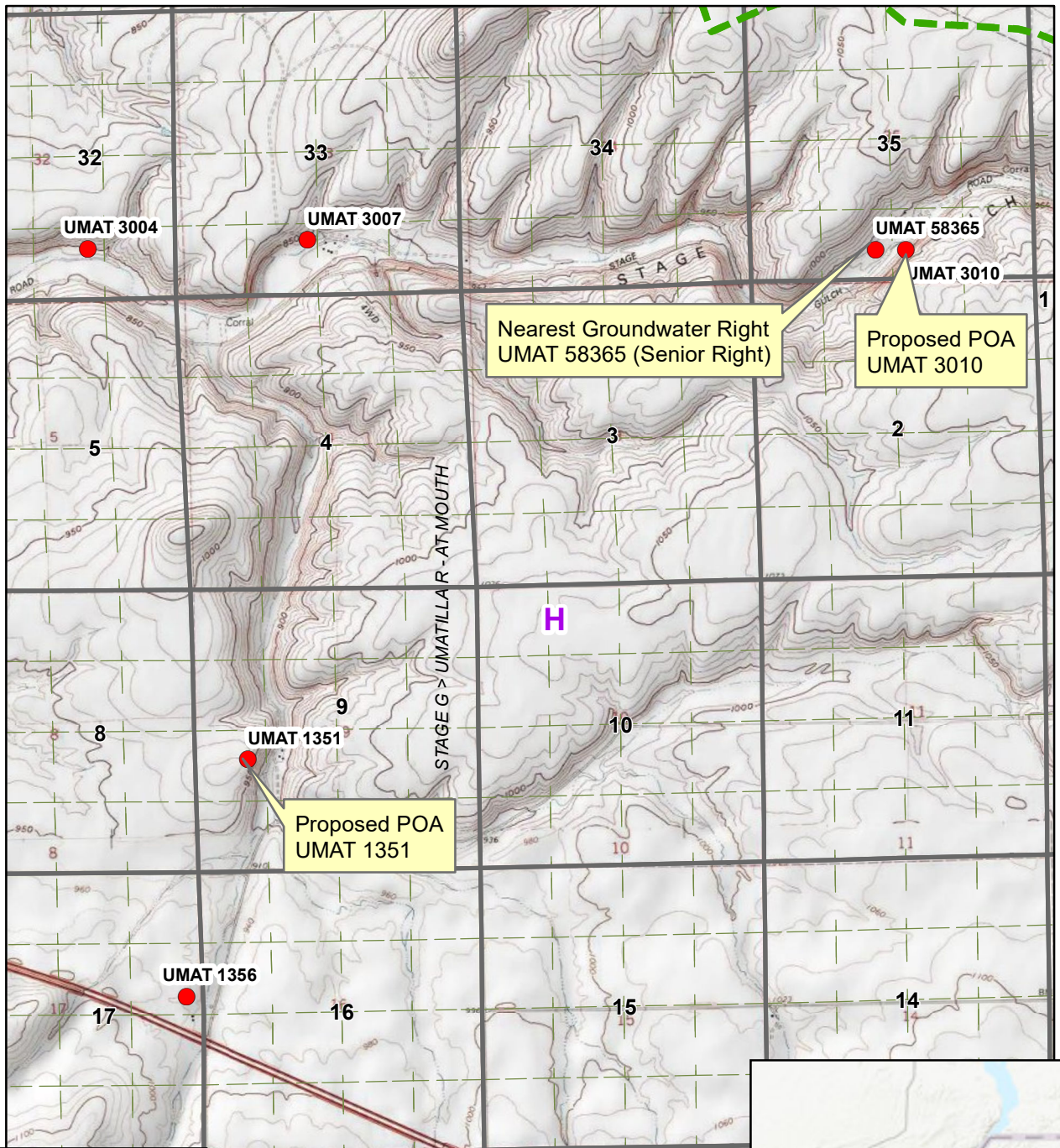
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T14815 Certificate 80849 Continued

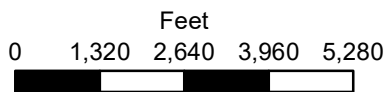
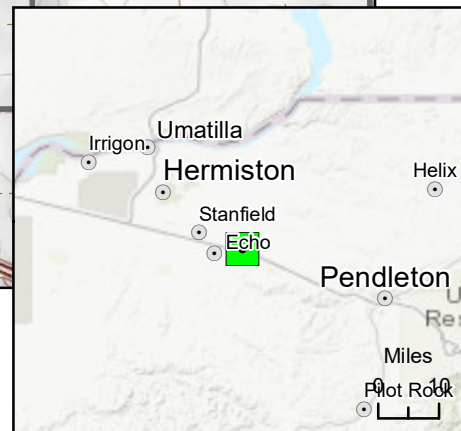


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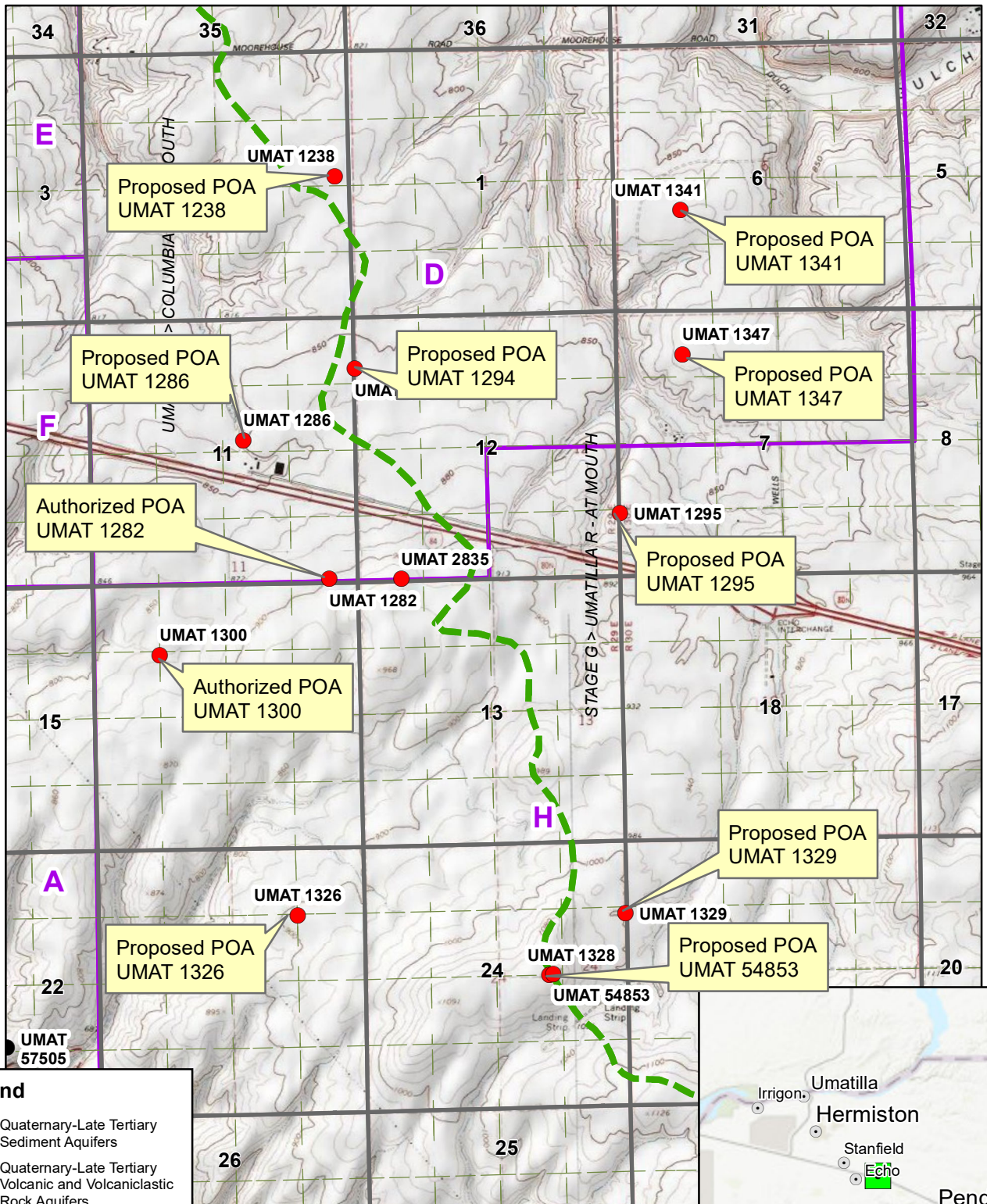
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T14815 Certificate 80850

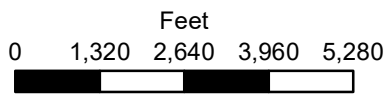
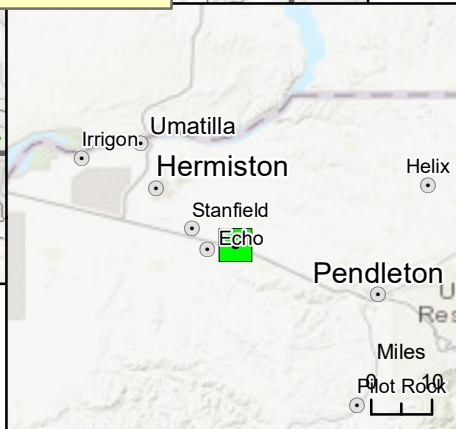


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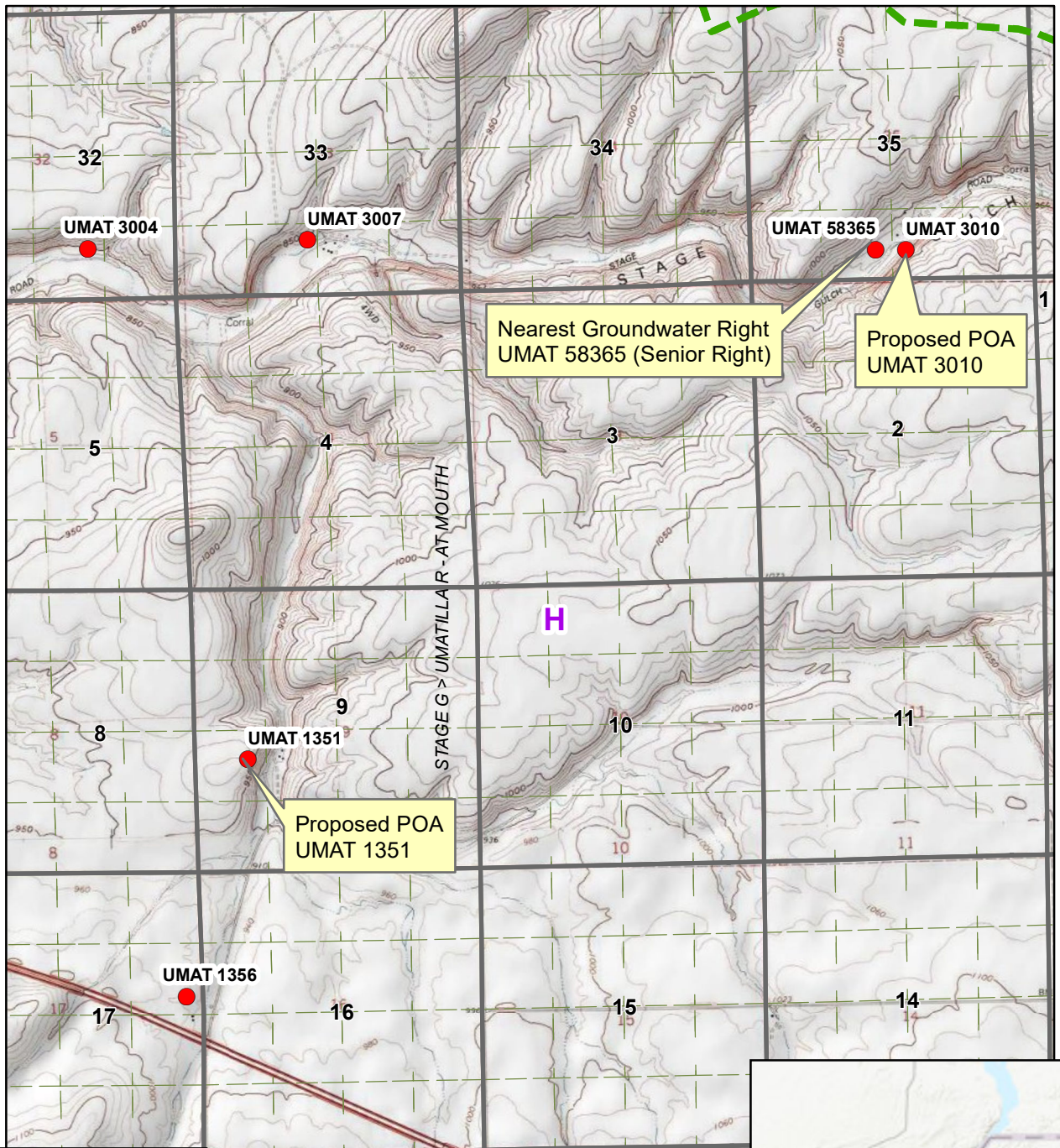
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T14815 Certificate 80850 Continued

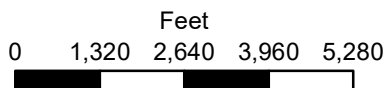
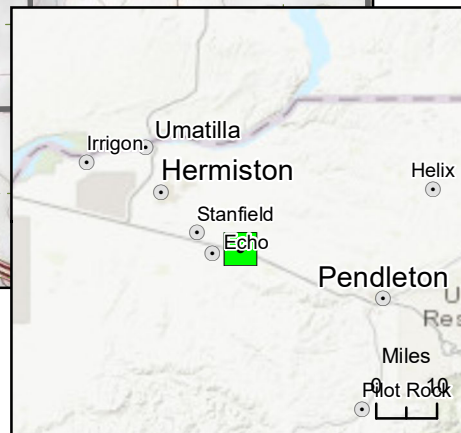


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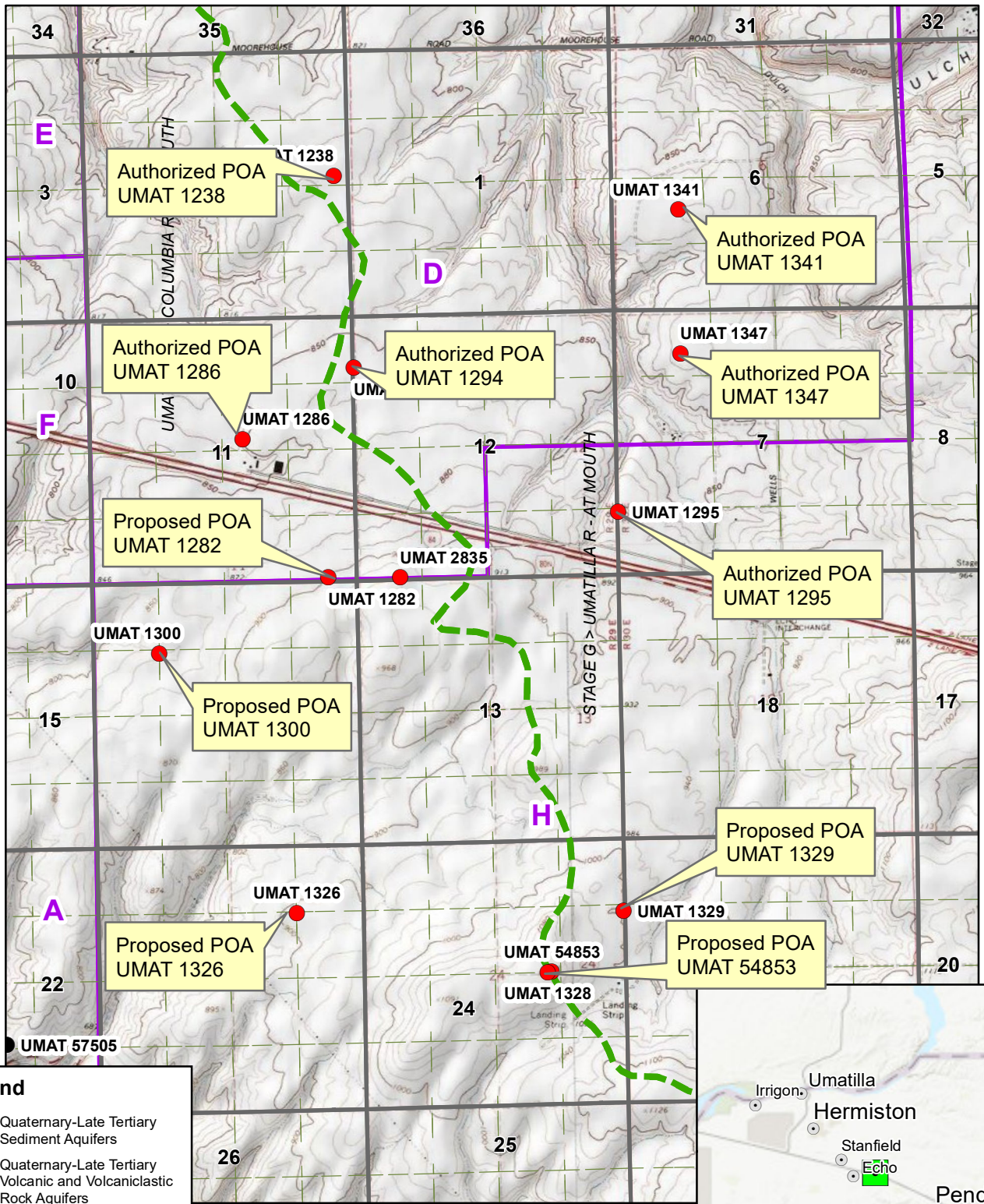
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T14815 Certificate 85124

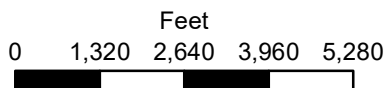
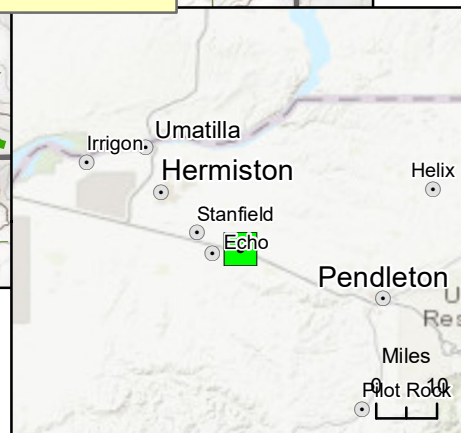


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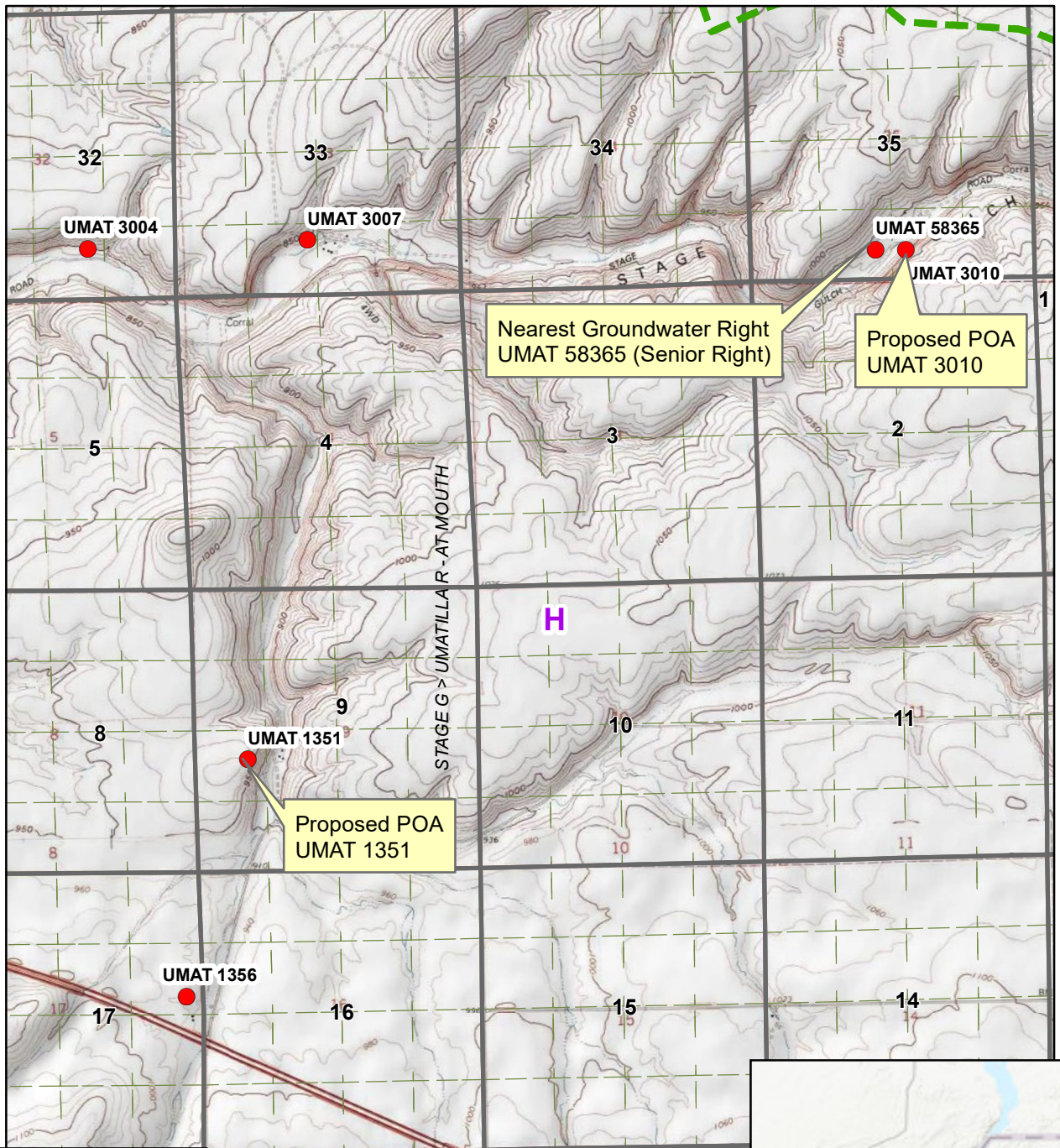
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T14815 Certificate 85124 Continued



Nearest Groundwater Right
UMAT 58365 (Senior Right)

Proposed POA
UMAT 3010

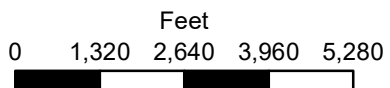
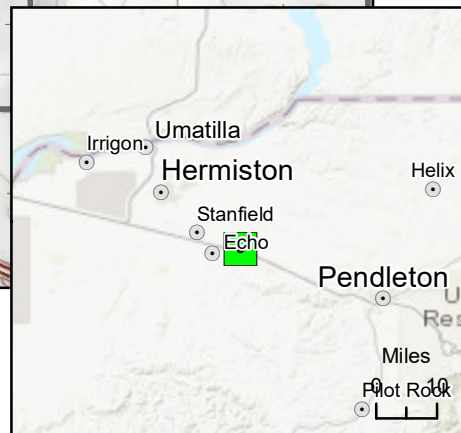
Proposed POA
UMAT 1351

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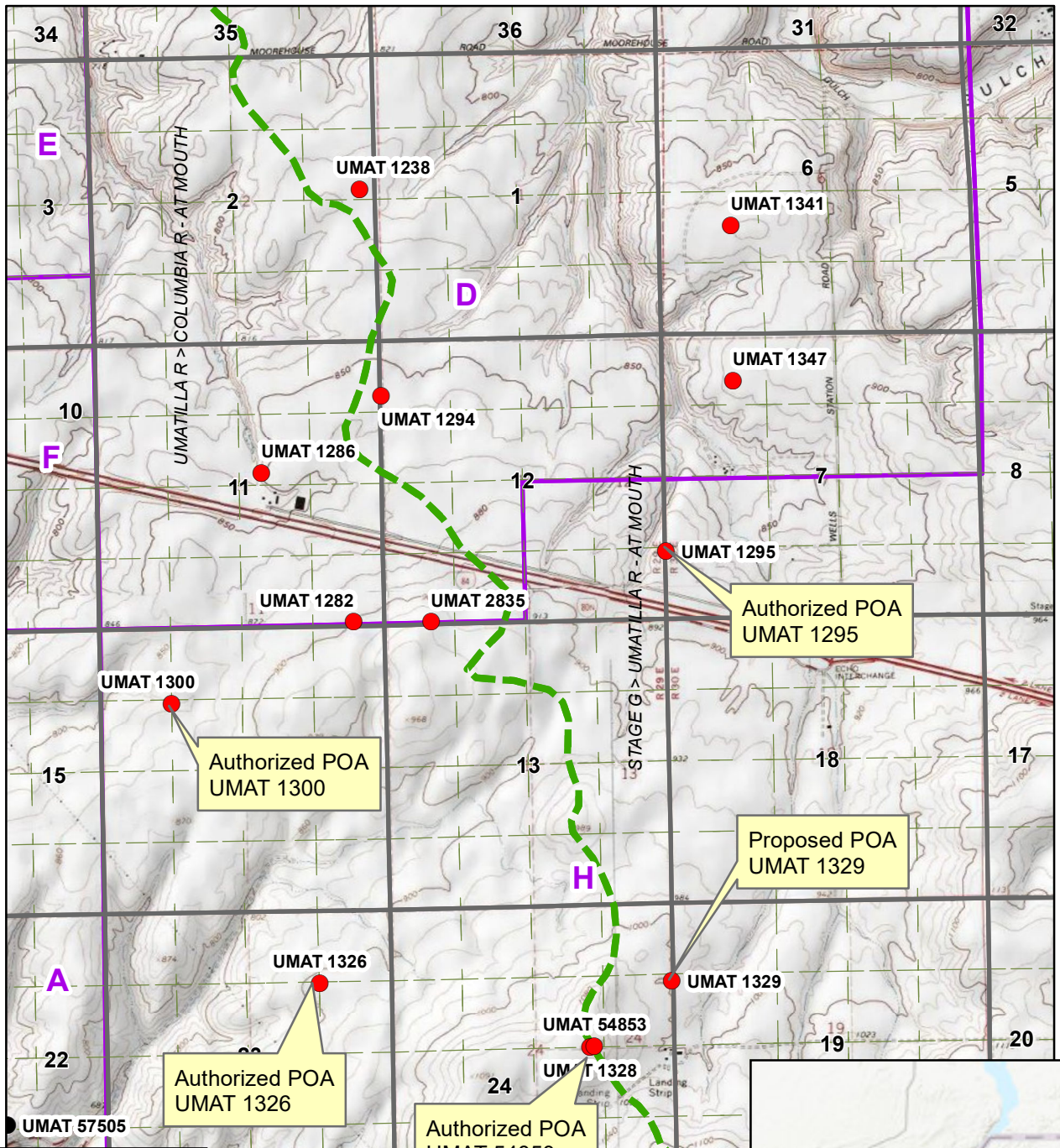
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T14815 Certificates 87666 and 87667

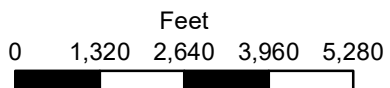
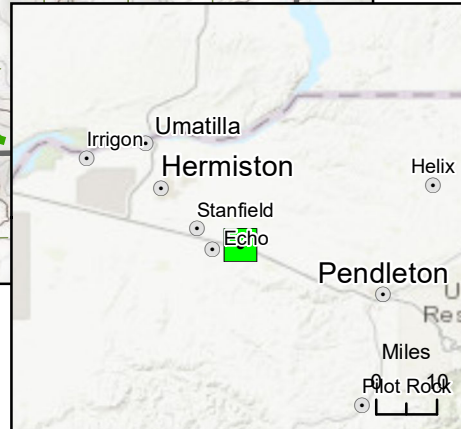


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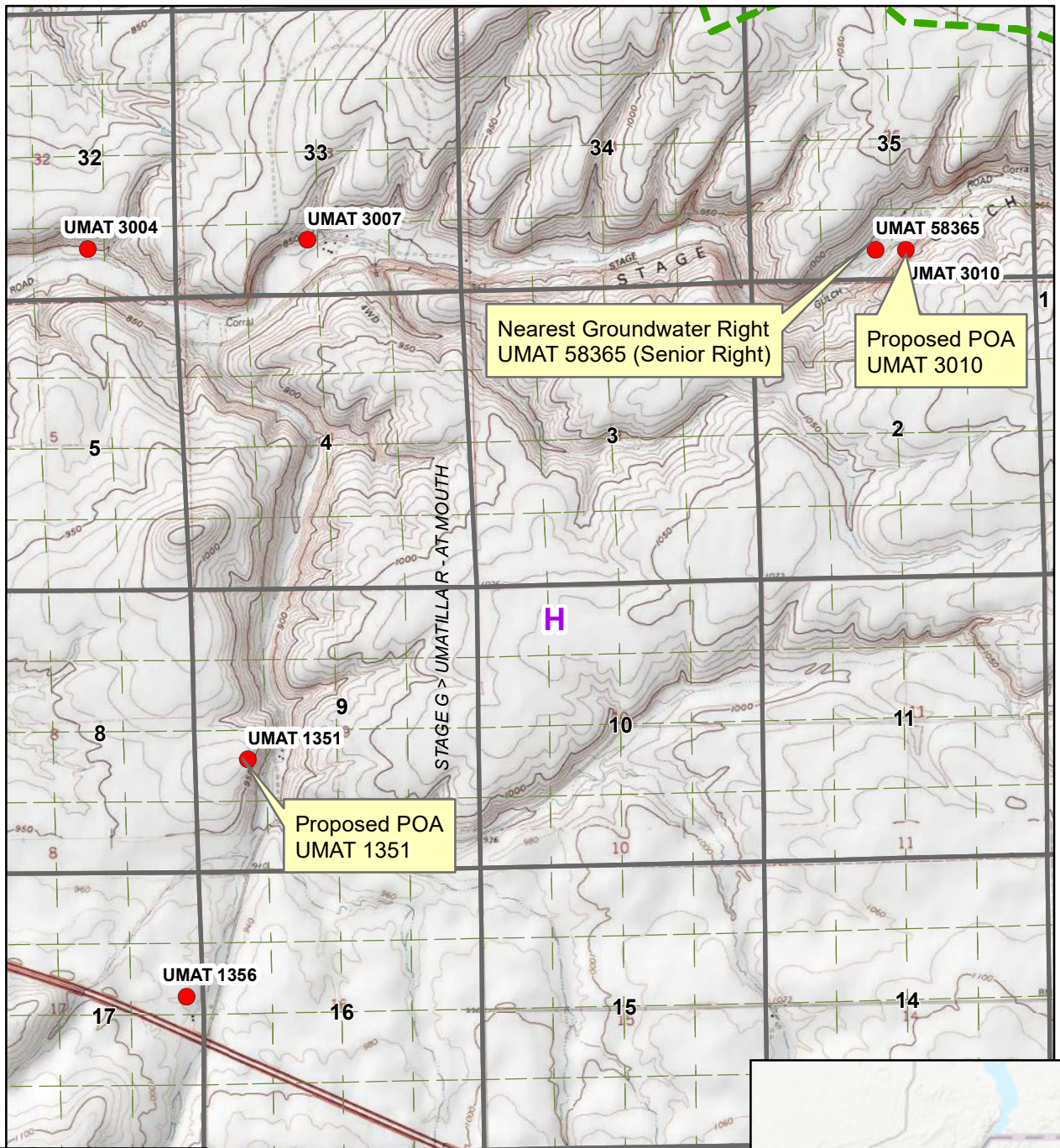
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T14815 Certificates 87666 and 87667 Continued



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