



# Oregon

Tina Kotek, Governor

## Water Resources Department

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## MEMORANDUM

**PREPARED FOR:** Oregon State University AR LL - 2035

**PREPARED BY:** Mitra Khadka, Hydrogeologist

**SUBJECT:** AR Limited License Application: Oregon State University

**DATE:** 09/04/2026

### **Background**

The OWRD received an AR LL application from the Oregon State University (OSU) on July 8, 2026. Completeness review by the OWRD Water Right Section determined the application was incomplete on July 16, 2028. The OSU resubmitted the application with requested additional documents/information on July 31, 2026.

### **Review Comments**

OWRD and DEQ have reviewed the application and determined that it is incomplete. The following comments and feedback are provided to identify the additional information and/or revision needed to complete the application:

#### **1. AR LL Eligibility**

After reviewing the application for AR LL, we have determined that the proposed project does not appear to meet the definition of AR, which requires water to be diverted from another source to a groundwater reservoir. The application proposes pumping groundwater from an alluvial aquifer and reinjecting the water into the same aquifer. Based on the information provided, the proposed source water and receiving aquifer appear to be the same.

#### **2. Potential Regulatory Pathways**

Here are some potential pathways to consider for this project:

- If you wish to proceed under the AR LL pathway, you must revise the proposed source water so that it is different from the target aquifer. If you revise the application to use eligible sources of water, you may resubmit the application for consideration as an AR LL.
- Because you already hold a DEQ UIC permit authorizing injection through a drywell, you may coordinate with DEQ regarding whether the UIC permit, together with an appropriate OWRD groundwater right authorization, could be used to conduct the proposed project. However, the water right associated with CLAC 74247 (Certificate:

98952) is currently authorized for irrigation use. Therefore, if you intend to use some or all the water authorized under this right for the proposed project, you may need to submit an appropriate transfer application to OWRD to get authorization for the proposed change in use. Please contact Lisa Jaramillo (503-871-1889 / [Lisa.J.Jaramillo@water.oregon.gov](mailto:Lisa.J.Jaramillo@water.oregon.gov)) in the Transfer and Conservation Section if you wish to learn more about pursuing a Change of Use transfer.

- Another potential approach could be to apply for a temporary water right (limited license) that could authorize the use of water from well CLAC 74247 for your project purposes. The applicability of this pathway would depend on the specific nature, duration and proposed use and would need to be evaluated under the applicable OWRD requirements. The proposed use would need to be non-consumptive (i.e. not result in a net loss of water from the aquifer).

### **3. Clarification regarding the DEQ UIC permit**

We also noted that the current DEQ UIC permit appears to authorize injection of stormwater collected from roof and solar panel, as well as public drinking water. The permit does not appear to specifically address injection of groundwater pumped from CLAC 74247 or other groundwater wells. Therefore, you may want to correspond with DEQ to confirm whether the existing UIC permit authorizes the proposed injection of groundwater pumped from CLAC 74247 and/or any other wells. If the existing permit does not authorize this activity, additional authorization or a modification to the UIC permit may be necessary.