Groundwater Application Review Summary Form

Application # G- 18629 GW Reviewer Ben Scandella, Derris Orlowski Date Review Completed: 6128118
Summary of GW Availability and Injury Review:
[] Groundwater for the proposed use is either over appropriated, will not likely be available in the amounts requested without injury to prior water rights, OR will not likely be available within the capacity of the groundwater resource per Section B of the attached review form.
Summary of Potential for Substantial Interference Review:
[] There is the potential for substantial interference per Section C of the attached review form.
Summary of Well Construction Assessment:
[] The well does not appear to meet current well construction standards per Section D of the attached review form. Route through Well Construction and Compliance Section.
This is only a summary. Documentation is attached and should be read thoroughly to understand the basis for determinations and for conditions that may be necessary for a permit (if one is issued).

Oly

MEMO

To:

Kristopher Byrd, Well Construction and Compliance Section Manager

From:

Joel Jeffery, Well Construction Program Coordinator

Subject:

Review of Water Right Application G-18629

Date:

August 28, 2018

The attached application was forwarded to the Well Construction and Compliance Section by Water Rights. Dennis Orlowski and Ben Scandella reviewed the application. Please see Dennis's and Ben's review and the well log.

Applicant's Well #1 (MULT 1580): Based on a review of the Well Report, Applicant's Well #1 does not appear to comply with current minimum well construction standards (See OAR 690 Division 210). The water supply well report does not indicate the amount bentonite used to fill the upper annular space and therefore there is no way to determine if the correct amount of bentonite was used. In order to meet minimum well construction standards, the well must be resealed with an approved grout.

My recommendation is that the Department **not issue** a permit for Applicant's Well #1 (MULT 1580) unless it is brought into compliance with current minimum well construction standards or information is provided showing that it is in compliance with current minimum well construction standards.

Bringing Applicant's Well #1 into compliance with minimum well construction standards may not satisfy hydraulic connection issues.

The original and first copy WATER WELL REPORT of this report are to be TATE ENGINEER, SALEM, OREGON 1310 1768 Triease type or print) within 30 days from the date (Do not write above this line) State Fermit No. of well completion. STATE EN (11) LOCATION OF WELL: (1) OWNER: County Multnoman A. C. Jacobson Jr. Driller's well number Box 119-A Rt 04 T. 2N Portland, Oregon 34 Section Bearing and distance from section or subdivision corner (2) TYPE OF WORK (check): Reconditioning [Deepening 🔲 If abandonment, describe material and procedure in Item 12. (3) TYPE OF WELL: (4) PROPOSED USE (check): Diameter of well below casing 8 inch (12) WELL LOG: Driven 🗌 Rotary 🛣 Domestic | Industrial | Municipal | 75 ft. Depth of completed well Cable Jetted 🔲 Depth drilled Dug Bored [Irrigation Test Well Other Formation: Describe color, texture, grain size and structure of materials; CASING INSTALLED: Threaded Welded and show thickness and nature of each stratum and aquifer penetrated, with at least one entry for each change of formation. Report each change " Diam. from O ft. to 75 ft. Gage 2 Wall in position of Static Water Level as drilling proceeds. Note drilling rates. ." Diam. from ft. to ft. Gage MATERIAL SWL ." Diam. from ft. to ft. Gage 3 Top soil 0 3 20 Brown clay PERFORATIONS: Perforated? 🗌 Yes 🛣 No. Yellow clay 20 50 Type of perforator used 50 60 Brown clay Size of perforations in, by 75 Sand and gravel perforations from _____ ft. to _____ perforations from ft, to perforations from _____ ft. to _____ ft. perforations from _____ ft. to _____ ft. perforations from _____ft. to ___ (7) SCREENS: Well screen installed? 🗌 Yes 📜 No Manufacturer's Name Model No. .. Diam. Slot size Set from ft. to ... Diam. Slot size Set from ft. to ft. (8) WATER LEVEL: Completed well. ft. below land surface Date 4-24-68 S'™ level jan pressure lbs. per square inch Date Drawdown is amount water level is lowered below static level (9) WELL TESTS: Was a pump test made? Yes No If yes, by whom? Work started Completed 19 gal./min. with ft. drawdown after hṛs. Date well drilling machine moved off of well 4-24-68 " Drilling Machine Operator's Certification: This well was constructed under my direct supervision. Mate-300 gal./min. with 30 ft. drawdown after Bailer test rials used and information reported above are true to my best knowledge and belief. Artesian flow g.p.m. Date [Signed] Temperature of water Was a chemical analysis made?

Yes No (10) CONSTRUCTION: Drilling Machine Operator's License No. 254 Bentonite Well seal-Material used . 25 feet Depth of seal Water Well Contractor's Certification: This well was drilled under my jurisdiction and this report is Diameter of well bore to bottom of seal true to the best of my knowledge and belief. Were any loose strata cemented off?

Yes 1 No Depth NAME Ralph Turner Drilling Was a drive shoe used? [] Yes I No (Person, firm or corporation) (Type or print) Did any strata contain unusable water? 🔲 Yes 🗶 No Address Rte. Box lsboro, depth of strata Type of water? Method of sealing strata off Was well gravel packed? ☐ Yes ☐ No Size of gravel: Contractor's License No. 247 Date Gravel placed from ft. to

NICE TO WATER WELL CONTRACTOR

TO WATER WELL Copy
The original and first copy
This report are to be NITICE TO WATER WELL CONTRACTOR The original and first copy of this report are to be filed with the

TATE ENGINEER, SALEM, OREGON 9/310, Fin 50 1268 (Flease type or print) within 30 days from the date (Do not write above this line) within 30 days from the date State Fermit No. of well completion. (11) LOCATION OF WELL: (1) OWNER: A. C. Jacobson Jr. County Multnoman Driller's well number Rt 1 Box 119-A **Ø**₩ _{T.} **Q**N Portland, Oregon 14 Section W.M. Bearing and distance from section or subdivision corner (2) TYPE OF WORK (check): New Well K Deepening 🔲 Reconditioning Ábandon 🔲 If abandonment, describe material and procedure in Item 12. (3) TYPE OF WELL: (4) PROPOSED USE (check): Diameter of well below casing 8 inch (12) WELL LOG: Driven 🔲 🔝 ... Rotary 🍒 Domestic | Industrial | Municipal | 75 ft. Depth of completed well Cable Jetted | Depth drilled $\bar{\Box}$ Bored [Irrigation Test Well Other Dug Formation: Describe color, texture, grain size and structure of materials; and show thickness and nature of each stratum and aquifer penetrated, CASING INSTALLED: Threaded | Welded with at least one entry for each change of formation. Report each change ..." Diam. from _____O ft. to ____75 ft. Gage 2 wall in position of Static Water Level as drilling proceeds. Note drilling rates. Diam. from _____ ft. to _____ ft. Gage ____ SWT. MATERIAL ... ft, to 3 Top soil 3 20 Brown clay **PERFORATIONS:** Perforated? 🗌 Yes 🛣 No. 20 50 Yellow clay Type of perforator used 60 50 Brown clay Size of perforations in, by Sand and gravel 60 perforations from ft. to perforations from _____ ft. to _____ ft. _____ perforations from _____ ft. to _____ ft. _____ft. to ____ (7) SCREENS: Well screen installed? ☐ Yes I No Manufacturer's Name Model No. Slot size Set from Diam. Slot size Set from ft. to ft. (8) WATER LEVEL: Completed well. ft. below land surface Date 4-24-68 Control level ...lan pressure lbs. per square inch Date Drawdown is amount water level is lowered below static level (9) WELL TESTS: Was a pump test made? Yes No If yes, by whom? Completed 4-24-68 19 gal./min. with ft. drawdown after hrs. Date well drilling machine moved off of well 4-24-68 " Drilling Machine Operator's Certification: This well was constructed under my direct supervision. Mate-300 gal./min. with 30 ft. drawdown after Bailer test rials used and information reported above are true to my best knowledge and belief. Artesian flow g.p.m. Date Temperature of water Was a chemical analysis made?

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Yes 1 No Depth NAME Ralph Turner Drilling Co. Was a drive shoe used? 🔲 Yes 🕱 No (Person, firm or corporation) (Type or print) Did any strata contain unusable water? 🔲 Yes 🛣 No Box Hillsboro, Oregon Address Rte. Type of water? depth of strata Method of sealing strata off (Water Well Contractor) Was well gravel packed? ☐ Yes ☐ No Size of gravel: Contractor's License No. 247 Date 4-25 Gravel placed from ft. to ft.

PUBLIC INTEREST REVIEW FOR GROUNDWATER APPLICATIONS

TO: FROM:												
ar in in	CITI					Revi	ewer's Name					
SUBJE	CI:	Appli	cation G	18629		Su	persedes re	view of		Date of R	teview(s)	
OAR 69 welfare, to deterrithe press	90-310-13 safety armine whe umption of	30 (1) Tend healt ether the criteria.	he Departn h as describ presumptio	bed in ORS on is establi w is based	resume that 537.525. D shed. OAR upon avail	t a proposi epartment 690-310- able infor	ed groundwa staff review 140 allows t rmation and	groundwate he proposed l agency pol i	ensure the preensure the preensure the modifications in place and the color of the	under OA ed or con at the tin	AR 690-3 ditioned t ne of eval	10-140 o meet uation.
A1.	Applica	nt(s) se	ek(s) <u>0.32</u>	cfs fror	n <u>2</u>	well	(s) in the	Willamette				Basin,
	I	Lower V	Villamette			subb	asin.					
A2.	Propose	d use _	Irrigation (2	25.2 acres)		Seas	sonality: <u>M</u>	larch 1 throu	gh October 31			
A3.	Well and	d aquife	er data (att a	ch and nu	mber logs f	for existin	g wells; ma	rk proposed	wells as such	under l	ogid):	-
Well	l Logid Applicant's Well #		Propos	ed Aquifer*	Prop Rate		Location (T/R-S QQ-Q)		Location, metes and bounds, e.g. 2250' N, 1200' E fr NW cor S 36			
1	MULT 1		1		lluvial		32	2N/1W-4 NE			0' W fr SE	
2	Propose	ed [2	A	lluvial	0.	32	2N/1W-4 NE	-SE	1980' N, 400' W fr SE cor S4		
* Alluviu	ım, CRB,	Bedrock										
	Well	First	1 > W/ I	SWL	Well	Seal	Casing	Liner	Perforations	Well	Draw	Test
Well	Elev	Wate ft bls	r ft ble	Date	Depth	Interval	Intervals	Intervals (ft)	Or Screens (ft)	Yield	Down (ft)	Type
1	ft msl 10	Not	10	4/24/1968	(ft) 100	(ft) 0-25	(ft) 0-75	None	None	(gpm) 300	30	Bailer
2	20	specifi	N/A	N/A	100	0-25	0-100	None	None	· · · · · · · · · · · · · · · · · · ·		
Use data	from appl	lication f	or proposed	wells.	' 		•	•		'	·	
A4.	4. Comments: The applicant's wells are located near the center of Sauvie Island, just south of the southern tip of Sturgeon Lake. The applicant states, "For Proposed Well 2, the well specification provided in the table below are estimates and subject to change based on actual conditions encountered in the field. The objective will be to construct the well to develop water from the alluvial aquifer."									d subject		
A5. 🛚	Provisions of the Willamette (OAR 690-502) Basin rules relative to the development, classification and/or management of groundwater hydraulically connected to surface water are, or are not, activated by this application. (Not all basin rules contain such provisions.) Comments The applicant's proposed wells are located farther than ¼ mile from both the Willamette River and Multnomah Channel, so the pertinent basin rules do not apply (OAR 690-502-0240).											
A6. □	Name of	f admin	istrative are	ea:					er limited by a			

B. GROUNDWATER AVAILABILITY CONSIDERATIONS, OAR 690-310-130, 400-010, 410-0070

B1.	Bas	Based upon available data, I have determined that groundwater* for the proposed use:								
	a.	is over appropriated, ⊠ is not over appropriated, or □ cannot be determined to be over appropriated during any period of the proposed use. * This finding is limited to the groundwater portion of the over-appropriation determination as prescribed in OAR 690-310-130;								
	b.	will not or will likely be available in the amounts requested without injury to prior water rights. * This finding is limited to the groundwater portion of the injury determination as prescribed in OAR 690-310-130;								
	c.	will not or will likely to be available within the capacity of the groundwater resource; or								
	d.	will, if properly conditioned, avoid injury to existing groundwater rights or to the groundwater resource: i. The permit should contain condition #(s) 7n (annual meas.), medium water-used reporting; ii. The permit should be conditioned as indicated in item 2 below. The permit should contain special condition(s) as indicated in item 3 below;								
B2.	a.	Condition to allow groundwater production from no deeper than ft. below land surface;								
	b.	Condition to allow groundwater production from no shallower than ft. below land surface;								
	c.	Condition to allow groundwater production only from the groundwater reservoir between approximately ft. and ft. below land surface;								
	d.	Well reconstruction is necessary to accomplish one or more of the above conditions. The problems that are likely to occur with this use and without reconstructing are cited below. Without reconstruction, I recommend withholding issuance of the permit until evidence of well reconstruction is filed with the Department and approved by the Groundwater Section.								
		Describe injury —as related to water availability— that is likely to occur without well reconstruction (interference w/ senior water rights, not within the capacity of the resource, etc):								
В3.	<u>dep</u> <u>feet</u>	bundwater availability remarks: Wells #1 obtains and #2 will obtain groundwater from water-bearing sand and gravel osits of the Unconsolidated Sedimentary Aquifer (USA), which in this area has a total cumulative thickness of 200-300 (Swanson and others, 1993; Conlon and others, 2005). The general coincidence of local groundwater and surface waterels indicates hydraulic connection between the USA and the Columbia River system in this area.								
	mos wel	hin approximately 2 miles of the proposed POA location there are about 10 wells completed in the alluvial aquifer with otly irrigation and nursery groundwater rights, as well as a large municipal right, and several more exempt (domestic) is also in the area. Reported maximum yields in the nearby alluvial wells range up to ~600 gpm, but are more typically on order of 20-100 gpm.								
	the unce efficavai	undwater is likely available and not over-appropriated in this area due to the large storage capacity and permeability of aquifer materials (primarily sand and gravel) and the high rate of recharge (Conlon and others, 2005). Recharge in this confined USA system comes from both precipitation and nearby surface water, especially due to the proximity and client hydraulic connection to the Multnomah Channel. While groundwater level data for aquifer wells in the area is not lable over long periods to definitively determine the current state of the groundwater resource, the nearest well showing reterm data in the sedimentary aquifer system (COLU 3379, more than 10 miles to the north) is also probably								

available over long periods to definitively determine the current state of the groundwater resource, the nearest well showing long-term data in the sedimentary aquifer system (COLU 3379, more than 10 miles to the north) is also probably hydraulically well-connected with local surface water and shows relative long-term stability for the past 50 years. Despite this conclusion, and because local groundwater data is nearly non-existent, the permit conditions noted in B1(d)(i) are recommended to provide additional information to support future understanding and management of the groundwater resource in this area. If the applicants provide the well log or a well inspection report for Well #2 confirming that it is open to the same aquifer system as Well #1 (pending approval from an OWRD hydrogeologist), then due to the high transmissivity of the aquifer system and the close proximity and similar completion of all the wells, it would be sufficient to provide annual water level measurements from either of the 2 wells

C. GROUNDWATER/SURFACE WATER CONSIDERATIONS, OAR 690-09-040

C1. **690-09-040** (1): Evaluation of aquifer confinement:

Well	Aquifer or Proposed Aquifer	Confined	Unconfined
1	Alluvium		. 🛛
2	Alluvium		\boxtimes

Basis for aquifer confinement evaluation: The well log for Well #1, as well as for nearby wells, shows water-bearing sand and gravel deposits overlain by 60-80 of low-permeability silt and clay. Locally, the aquifer tapped by some of these wells might be under semi-confined conditions. However, on Sauvie Island the overlying low-permeability deposits are not laterally extensive (Swanson and others, 1993; Conlon and others, 2005; Gannett and Caldwell, 1998). This characteristic, coupled with the efficient hydraulic connection between the USA and the Columbia River system, suggests that the USA is generally unconfined.

C2. **690-09-040** (2) (3): Evaluation of distance to, and hydraulic connection with, surface water sources. All wells located a horizontal distance less than ¼ mile from a surface water source that produce water from an unconfined aquifer shall be assumed to be hydraulically connected to the surface water source. Include in this table any streams located beyond one mile that are evaluated for PSI.

Well	SW #	Surface Water Name	GW Elev ft msl	SW Elev ft msl	Distance (ft)	Conn	ulically ected? ASSUMED	Potentia Subst. Int Assum YES	terfer.
1	1	Mud Slough	0-10	5-20	1,900	\boxtimes			\boxtimes
1	2	Dairy Creek	0-10	10-20	4,200	\boxtimes			
2	1	Mud Slough	0-10	5-20	2,100	\boxtimes			\boxtimes
2	2	Dairy Creek	0-10	10-20	3,800				\boxtimes

Basis for aquifer hydraulic connection evaluation: Groundwater elevations were estimated using static water levels in the well log and land surface elevations for Well #1, and ranges of likely elevations were assumed based on those for Well #2. The similarity of elevations between groundwater and surface water, combined with the discontinuous nature of the low-permeability deposits overlying the USA, suggest that the alluvial aquifer is hydraulically connected to SW #1 and SW#2.

Water Availability Basin the well(s) are located within: None established

C3a. 690-09-040 (4): Evaluation of stream impacts for each well that has been determined or assumed to be hydraulically connected and less than 1 mile from a surface water source. Limit evaluation to instream rights and minimum stream flows that are pertinent to that surface water source, and not lower SW sources to which the stream under evaluation is tributary. Compare the requested rate against the 1% of 80% natural flow for the pertinent Water Availability Basin (WAB). If Q is not distributed by well, use full rate for each well. Any checked box indicates the well is assumed to have the potential to cause PSI.

Well	SW #	Well < ¼ mile?	Qw > 5 cfs?	Instream Water Right ID	Instream Water Right Q (cfs)	Qw> 1% ISWR?	Natural Flow (cfs)	Qw > 1% of 80% Natural Flow?	Interference @ 30 days (%)	Potential for Subst. Interfer. Assumed?
1	1									
1	2								-	
2	1						1			
2	2									

C3b. 690-09-040 (4): Evaluation of stream impacts by total appropriation for all wells determined or assumed to be hydraulically connected and less than 1 mile from a surface water source. Complete only if Q is distributed among wells. Otherwise same evaluation and limitations apply as in C3a above.

	SW #	Qw > 5 cfs?	Instream Water Right ID	Instream Water Right Q (cfs)	Qw> 1% ISWR?	80% Natural Flow (cfs)	Qw > 1% of 80% Natural Flow?	Interference @ 30 days (%)	Potential for Subst. Interfer. Assumed?
L	•					•			

			•			
	•					

Comments:

C3a: No WAB applies to the location of the applicant's wells, so they were not evaluated for potential for substantial interference.

C3b: Not applicable because well-specific rates were not specified.

C4a. **690-09-040 (5):** Estimated impacts on **hydraulically connected surface water sources greater than one mile** as a percentage of the proposed pumping rate. Limit evaluation to the effects that will occur up to one year after pumping begins. This table encompasses the considerations required by 09-040 (5)(a), (b), (c) and (d), which are not included on this form. Use additional sheets if calculated flows from more than one WAB are required.

Non-D	istributed	Wells	•	•				-					
·Well	SW#	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
													•
Well (as CFS		,										
Interfer	ence CFS												•
Distrib	uted Well	, , ,	, v		e exter	3	6	* 1 5		a v E, .	and the second second	-	×8 , -
Well	SW#	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	54411	<i>5411</i>	%	%	%	771dy %	%	- Jui	Aug %	З с р %	%	710V %	. %
Well C	as CFS	70	76	70	70	70	70	76	7/0	70	70	7/0	. 70
	ence CFS												
		%	%	%	%	%	%	%	%	%	%	%	- %
Well (as CFS	1.5	,,		,,				,	- 10	~		
	ence CFS												
		. %	%	%	%	%	%	%	%	%	%	%	%
Well (as CFS												
Interfer	ence CFS				,								
		%	%	%	%	%	%	%	%	%	%	%	%
Well (as CFS												-
Interfer	ence CFS												
		%	%	%	%	%	%	%	%	%	%	%	%
	as CFS												
Interfer	ence CFS												
		%	%	%	%	%	%	%	%	%	%	- %	%
	as CFS												_
Interfer	ence CFS	3 5 7.			g was .	, * e,	<u> </u>			4.			9 4
(A) = Tc	tal Interf.	х]		* -		** / Z*		- Maria - 1 - 1			Mrs. Letter
	% Nat. Q					*						_	
(C) = I	% Nat. Q	*			. Kegit 200	, %		* .	<u> </u>		i sa je greja r	X - 2	8 365 pr 15, 18 .
(D) = ((A) > (C)	1	√	V	1	4	1	V	V	1	1	√ ·	V
-	/B) x 100	-		 									
	l interferen	OF C	(D) 1111					CTG (C	1 2 2			000	

(A) = total interference as CFS; (B) = WAB calculated natural flow at 80% exceed. as CFS; (C) = 1% of calculated natural flow at 80% exceed. as CFS; (D) = highlight the checkmark for each month where (A) is greater than (C); (E) = total interference divided by 80% flow as percentage.

Basis for impact evaluation:

C4b. 690-09-040 (5) (b) The potential to impair or detrimentally affect the public interest is to be determined by the Water Rights Section.

C5. If properly conditioned, the surface water source(s) can be adequately protected from interference, and/or groundwater use
under this permit can be regulated if it is found to substantially interfere with surface water:
i. The permit should contain condition #(s);
ii. The permit should contain special condition(s) as indicated in "Remarks" below;

C6. SW / GW Remarks and Conditions:

References Used:

Application file: G-18629

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: U.S. Geological Survey Scientific Investigations Report 2005-5168.

Gannett, M.W. and Caldwell, R., 1998, Geologic framework of the Willamette Lowland aquifer system, Oregon and Washington: U.S. Geological Survey Professional Paper 1424-A, 32 p.

Hunt, B., 1999, Unsteady stream depletion from ground water pumping: Ground Water, v. 37, no. 1, p. 89-102.

Iverson, J., 2002, Investigation of the hydraulic, physical, and chemical buffering capacity of Missoula flood deposits for water quality and supply in the Willamette Valley of Oregon: Unpublished M.S. thesis, Oregon State University, 147 p.

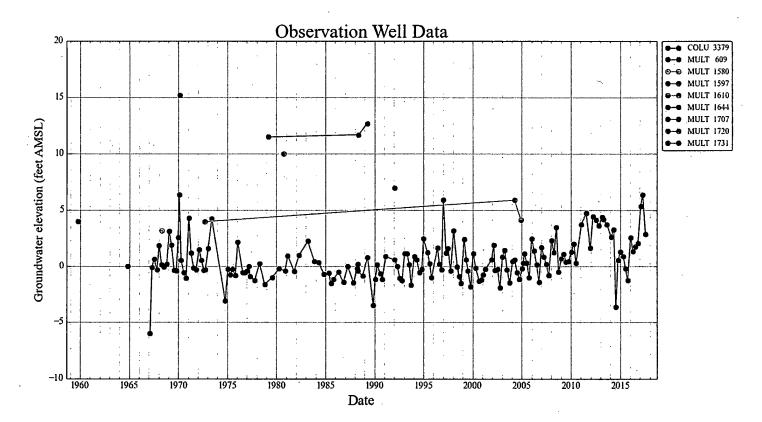
Swanson, R.D., McFarland, W.D., Gonthier, J.B., and Wilkinson, J.M., 1993, A description of hydrogeologic units in the Portland basin, Oregon and Washington: U.S.Geological Survey Water-Resources Investigations Report 90-4196, 56p.

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.

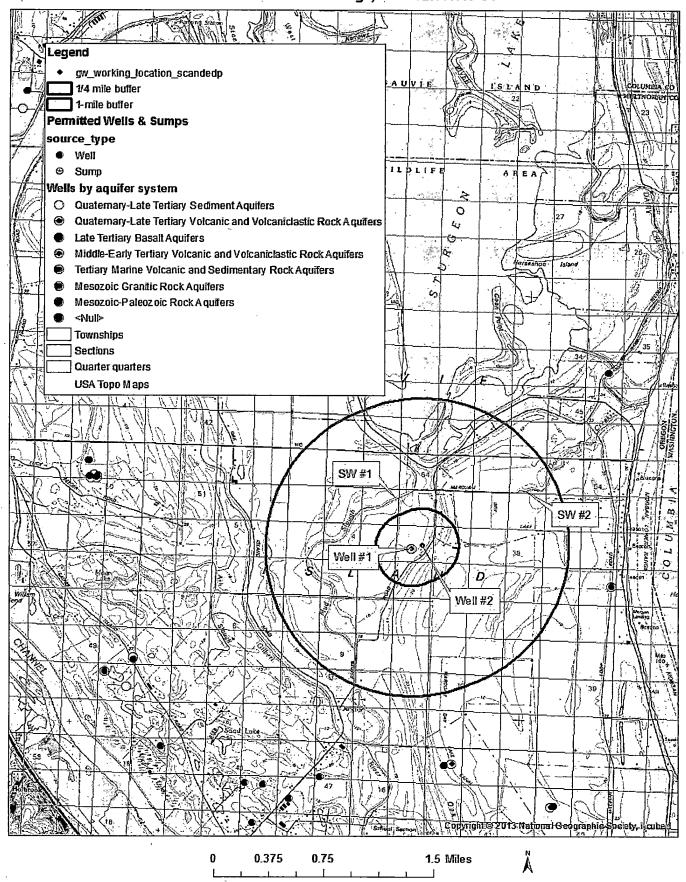
D. WELL CONSTRUCTION, OAR 690-200

D1.	Well #:	Logid:	
D2.	a. review of t		•
	b. I field inspe	etion by	<u> </u>
	d. d. other: (spe	wre	
D3.	THE WELL const	ruction deficiency or other comment is described as fol	llows:
			
D4. [Construction and Compliance Section for a review of o	existing well construction.

Water level trends from wells within approximately 2.5 miles of the applicant's well that obtain water from the sedimentary aquifer system, as well as the nearest sedimentary well with a long-term continuing trend (COLU 3379, over 10 miles north).



G-18629: Columbia Holdings, LLC. T2N/R1W-S4



MEMO



To: Kristopher Byrd, Well Construction and Compliance Section Manager

From: Joel Jeffery, Well Construction Program Coordinator

Subject: Re-Review of Water Right Application G-18629

Date: October 15, 2018

The attached application was forwarded to the Well Construction and Compliance Section by Water Rights. Dennis Orlowski and Ben Scandella reviewed the application. Please see Dennis's and Ben's review and the well log.

Applicant's Well #1 (MULT 1580): Based on information obtained from an on-site well inspection, it has been determined that Applicant's Well #1 does not comply with current minimum well construction standards (See OAR 690 Division 210). The water supply well report does not indicate the amount bentonite used to fill the upper annular space and therefore in order to determine the adequacy of the bentonite seal a field inspection of the well was conducted. The results of the inspection reveal that the well seal, and the top terminal height, do not meet minimum well construction standards. In order to meet minimum well construction standards, the well must be resealed with an approved grout and the casing height of the well must be extended. My recommendation is that the Department **not issue** a permit for Applicant's Well #1 (MULT 1580) unless it is brought into compliance with current minimum well construction standards or information is provided showing that it is in compliance with current minimum well construction standards.

Bringing Applicant's Well #1 into compliance with minimum well construction standards may not satisfy hydraulic connection issues.