

**Oregon Water Resources Department
Water Right Services Division**

Application for Extension of Time

In the Matter of the Application for an Extension of Time for)
Permit G-17966, Water Right Application G-17562, in the)
name of Rattlesnake Creek Land and Cattle)

**PROPOSED
FINAL ORDER
TO DENY**

Permit Information

Application:	G-17562
Permit:	G-17966
Basin:	12 – Malheur Lake / Watermaster District 10
Date of Priority:	June 11, 2012
Source of Water:	Well 3, Well 4, Well 5, Well 6, Well 7, Well 8, Well 9, Well 10, Well 11, Well 12, Well 13, Well 14, and Well 16 in Rock Creek Basin
Purpose or Use:	Irrigation of 1772.6 acres and supplemental irrigation of 511.3 Acres
Maximum Rate:	11.34 cubic feet per second (cfs), further limited to 6.39 cfs for supplemental irrigation of 511.3 acres

This Extension of Time request is being processed in accordance with Oregon Revised Statute 537.630 and 539.010(5), and Oregon Administrative Rule Chapter 690, Division 315.

In Summary, the Department proposes to:

- Deny an extension of time to complete construction of the water system from May 2, 2018, to October 1, 2023.

- Deny an extension of time to apply water to full beneficial use from May 2, 2018, to October 1, 2023.

ACRONYM QUICK REFERENCE

Application – Application for Extension of Time
Application for a Permit to Use Ground Water – Permit Application
Department – Oregon Department of Water Resources
FOF – Finding of Fact
PFO – Proposed Final Order
cfs – cubic feet per second

Well Reference

Permit Well Number	Well Log	Permit Well Number	Well Log
Well #3	HARN 227/51858	Well #4	HARN 222
Well #5	HARN 52187	Well #6	HARN 52708
Well #7	HARN 52767	WELL #8	HARN 52768
Well #9	HARN 52754	Well #12	HARN 226
Well #13	HARN 225	Monitor Well	HARN 52189

AUTHORITY

Generally, see ORS 537.630 and OAR Chapter 690 Division 315.

ORS 537.630(2) provides in pertinent part that the Oregon Water Resources Department (Department) for good cause shown shall order and allow an extension of time within which irrigation or other works shall be completed or the right perfected. In determining the extension, the Department shall give due weight to the considerations described under ORS 539.010(5) and to whether other governmental requirements relating to the project have significantly delayed completion of construction or perfection of the right.

ORS 539.010(5) instructs the Director to consider: the cost of the appropriation and application of the water to a beneficial purpose; the good faith of the appropriator; the market for water or power to be supplied; the present demands therefor; and the income or use that may be required to provide fair and reasonable returns upon the investment.

OAR 690-315-0040 provides that in order to approve an application for an extension of time to complete construction or apply water to full beneficial use, the Department shall make the findings in OAR 690-315-0040(1) including a finding that there is “good cause” to approve the extension. OAR 690-315-0040(2)-(4) contains the factors that the Department must consider to make findings that support a “good cause” determination.

FINDINGS OF FACT

1. On May 2, 2013, Permit G-17037 was issued by the Department. The permit authorized the use of up to 20.0 cfs for irrigation of 2,416.0 acres, further limited to 6.39 cfs for supplemental irrigation of 511.3 acres from Well 3, Well 4, Well 5, Well 6, Well 7, Well 8, Well 9, Well 10, Well 11, Well 12, Well 13, Well 14, and Well 15 in Rock Creek Basin. The permit specified completion of construction and application of the water was to be made within five years of the date of permit issuance, being May 2, 2018.

2. On January 15, 2015, the Department approved Permit Amendment T-11863 (Special Order Volume 93, Page 1105), authorizing a change in Point of Appropriation (POA) under Permit G-17037. Superseding Permit G-17312 was issued on January 15, 2015, to reflect the changes.
3. On August 12, 2015, Bo Thorenfeldt submitted an Affidavit for the Partial Cancellation of a Water Right Permit, requesting cancellation of 306.7 acres of Primary Irrigation under permit G-17312. On June 8, 2017, the Department issued an Order in the Matter of Cancellation of Water Right Permit G-17562, and issued superseding permit G-17764 to describe the portion of the water right not canceled.
4. On January 31, 2018, the Department issued a Correcting Order in the Matter of Water Right Permit G-17764, to correct two scrivener's errors which incorrectly describe the permit to be partially canceled and the wells used for appropriation. Superseding Permit G-17966 was issued to describe the corrections.
5. On January 31, 2018, Superseding Permit G-17966 was issued by the Department. The permit authorized the use of up to 11.34 cfs for irrigation of 1,772.6 acres, further limited to 6.39 cfs for supplemental irrigation of 511.3 acres from Well 3, Well 4, Well 5, Well 6, Well 7, Well 8, Well 9, Well 10, Well 11, Well 12, Well 13, Well 14, and Well 16 in Rock Creek Basin. The permit specified completion of construction and application of the water was to be made within five years of the date of permit issuance.
6. On September 25, 2017, a partial assignment from Bo Thorenfeldt to Rattlesnake Creek Land and Cattle Co. was recorded in the records of the Water Resources Department.
7. On February 7, 2019, correcting assignment was issued by the Department identifying Rattlesnake Creek Land and Cattle Co. as the only permit holder of record.
8. On May 7, 2019, Andy Root, owner of Rattlesnake Creek Land and Cattle Co. submitted an "Application for Extension of Time" (Application) to the Department, requesting both the time to complete construction of the water system and the time to apply water to full beneficial use under the terms and conditions of Permit G-17966 be extended from May 2, 2018, to October 1, 2023. This is the first permit extension requested for G-17966.
9. On May 21, 2019, notification of the Application for Extension of Time for G-17966 was published in the Department's Public Notice. No public comments were received regarding the extension application.

Review Criteria [OAR 690-315-0040]

In order to approve an Application for an Extension of Time to complete construction and/or apply water to full beneficial use pursuant to ORS 537.230 or 537.630, or to begin construction, pursuant to ORS 537.248, the Department must make the findings in OAR 690-315-0040(1)(a) – (d).

Start of Construction [OAR 690-315-0040(1)(b) and 690-315-0040(5)]

ORS 537.630 (2) states in part that “the holder of a permit issued pursuant to ORS 537.625 shall prosecute the construction of a well or other means of developing and securing the ground water with reasonable diligence and complete the construction within a reasonable time fixed in the permit by the Water Resources Department, not to exceed five years after the date of approval of the application. However, the department, for good cause shown, shall order and allow an extension of time, including an extension beyond the five-year period, for the completion of the well or other means of developing and securing the ground water or for complete application of water to beneficial use” [emphasis added]. Permit G-17966 was issued pursuant to ORS 537.625.

10. The application states that construction of HARN 227/51858 (Well #3), HARN 222 (Well #4), HARN 226 (Well #12), and HARN 225 (Well #13), began prior to permit issuance. Item 7 of the Application contains a notation for each of the above wells that states, “(w)e think it is likely that the original applicant misstated the locations for Well #3, and Well #4 as they were existing wells for Certificate 67666. Similarly, we believe that the locations for Well #12 and 13 were meant to be as indicated on the well logs for HARN 225 and HARN 226, as they are existing wells (though additional investigation is needed to confirm they will comply with the 100 foot casing requirement).”
11. Section 3 of the Application for a Permit to Use Ground Water (Permit Application), submitted to the Department on June 11, 2012, states, “(a)ll wells are proposed, and are to be constructed to eliminate connection to surface water, to the extent possible”. Furthermore, the Well Development Table, located in Section 3 of the Permit Application, identifies ALL wells are “proposed”.

Based on Findings of Fact (FOF) 10 and 11, the Department has determined that Well #3, Well #4, Well #12, and Well #13, were not the wells proposed for use under the Permit Application submitted on June 11, 2012.

12. The Application states that construction of HARN 52187 (Well #5) began on May 13, 2015, in a location that is not authorized by the permit.
13. The Application states that construction of HARN 52708 (Well #6) began on February 5, 2018, in a location that is not authorized by the permit..

OAR 690-315-0040(5) states “if the extension is requested pursuant to OAR 537.230 or 573.630, the applicant must have begun actual construction work, as defined in OAR 690-315-0020(3)(d)(A) and (B), during the period required by statute. If the Department finds the applicant did not begin construction by that date, the permit cannot be extended, and the Department may begin cancellation proceeding pursuant to ORS 537.260 or 537.410.”

14. The Application provides no evidence of construction of any well authorized under this permit prior to May 2, 2018, being the date specified in the permit for completion of construction and complete application of water to the use.

Based on FOF 10, 11, 12, 13, and 14, the Department cannot find that construction of the well authorized under Permit G-17966 began (was prosecuted) within five years of permit issuance, being May 2, 2013, to May 2, 2018, the date established pursuant to ORS 537.630. An extension cannot be granted to extend the time needed to prosecute (begin) construction.

Good Cause [OAR 690-315-0040(1)(d)]

The Department must find that there is "good cause" to approve the extension. In making a "good cause" finding, the Department shall consider the requirements set forth under OAR 690-315-0040(2).

Reasonable Diligence of the Appropriator [OAR 690-315-0040(2)(a)]

In order to make a finding of "good cause" to approve the extension, the Department shall consider whether the applicant has demonstrated "reasonable diligence" in previous performance under the permit. OAR 690-315-0040(2)(a). In determining "reasonable diligence", the Department shall consider, but is not limited to, the following factors: a) The amount of construction completed within the time allowed in the permit or previous extension; b) The amount of beneficial use made of the water during the permit or previous extension time limits; c) Water right holder conformance with the permit or previous extension conditions; and d) Financial investments made toward developing the beneficial use of water.

Amount of Construction [OAR 690-315-0040(3)(a)]

15. The Application identified the following work was accomplished between May 2, 2013, and May 2, 2018:
 - installation of irrigation equipment, conduit, and sprinklers; and
 - construction of HARN 52189 (Monitoring Well).
16. The Application identifies construction of HARN 52767 (Well #7), HARN 52768 (Well #8), and HARN 52754 (Well #9), in a location not authorized by the permit, occurred between November 2018, and February 2019.

Based on FOF 15, the Department has determined that some construction occurred under Permit G-17966 between May 2, 2013, and May 2, 2018.

Based on FOF 10, 11, 12, 13, 14, and 16, the Department cannot find evidence of progress made towards completion of the water development and application of water to full beneficial use as allowed in the time period specified in the permit, because no construction of the wells authorized under Permit G-17966, has occurred. Therefore, the Department cannot find good cause or reasonable diligence towards the complete application of water to a beneficial use under G-17966.

Compliance with Conditions /OAR 690-315-0040(3)(c)

The water right permit holder's conformance with the permit conditions.

17. The Application identifies that compliance with the conditions requiring the installation of a totalizing flow meter, submittal of annual water use reports, and submittal of annual March static water level measurements; and the wells are constructed in accordance with the special well construction standards required by the permit.
18. Well #3, Well #4, Well #5, Well #6, Well #7, Well #8, Well #9, Well #12, and Well #13, are constructed in locations that are not authorized by Permit G-17966.

Based on FOF 10, 11, 12, 13, 14, 16, and 18, the Department has determined that compliance with conditions contained in the permit has not been demonstrated because the permit holder has not constructed any well authorized under the permit. Demonstrating compliance with conditions of the permit on wells that are not authorized under the permit cannot be considered compliance with permit conditions.

19. The Department has considered the permit holder's compliance with conditions, and has identified the following concerns: (1) the record does not show that a totalizing flow meter or other suitable measuring device has been installed on wells authorized by the permit, (2) the required March static water level measurements from wells authorized under Permit G-17966 have not been received by the Department, (3) annual reports of the amount of water used each month from wells authorized under Permit G-17966 have not been received by the Department, (4) the location of the construction of Monitoring Well has not been approved by the Department prior to construction, (5) production wells are not all equipped with dedicated measuring tubes, (6) the location of the wells deviate from that proposed in the permit. The Department recognizes that it is the intent of the permit holder to comply with all permit conditions at the time the conditions become applicable.

Based on FOF 19, the Department has determined that the permit holder has not demonstrated compliance with any of the permit conditions as required by Permit G-17966.

Failure to comply with permit conditions constitutes illegal use of water. Beneficial use of water under this permit, therefore, has not yet been demonstrated. In order to legally perfect the use of water under this permit, the permit holder must demonstrate that all conditions of the permit have been satisfied.

Beneficial Use of Water OAR [690-315-0040(3)(b)]

The amount of beneficial use made of the water during the permit time period.

20. The application identifies a maximum rate of 2,200 gallons per minute (gpm) (4.9 cfs) for irrigation of 160.8 acres, and supplemental irrigation of 423.1 acres, being 1,500 gpm from Well #3 for irrigation of 160.8 acres, and supplemental irrigation of 210.9 acres, 200 gpm from Well #4 for supplemental irrigation of 102.0 acres, and 500 gpm from Well #5 for supplemental irrigation of 110.2 acres.

21. No water has been appropriated from any well authorized under Permit G-17966.
22. Delay of beneficial use of water under Permit G-17966 was due, in part, transition of ownership of the property, concentration on the development of other water right permits, and confusion of the applicable completion date of the permit.

Based on FOF 21, the Department has determined that beneficial use of water has not yet been demonstrated under this permit because no water was appropriated from authorized wells, and not all permit conditions were satisfied by May 2, 2018.

Financial Investments to Appropriate and Apply Water to a Beneficial Purpose [OAR 690-315-0040(2)(b),(3)(d),(4)(d)]

23. An investment of approximately \$893,725 has been identified in the Application. The costs included items associated with construction of wells not authorized by the permit, consulting costs, costs of electricity to irrigate, and repair and maintenance costs of a system which are not “actual construction” under this permit and therefore are not counted towards development. After deducting these costs, the approximate total investment for “actual construction” to date is approximately \$530,698, which is approximately 61 percent of the total projected cost for complete development of this project. An additional \$342,000 investment is needed for the completion of this project.

Based on FOF 23, the Department has determined that the permit holder had made an investment in the water system.

Reasonable Diligence of the Appropriator [OAR 690-315-0040(2)(a)]

The Application provides evidence of construction of the water system; the permit holder has not prosecuted the construction of any well authorized under the permit; the permit holder has not demonstrated compliance with all permit conditions, and; beneficial use has not been demonstrated. The Department has determined the applicant has not demonstrated reasonable diligence in previous performance under Permit G-17966.

The Market and Present Demands for Water [OAR 690-315-0040(4)(a-f)]

The Department's determinations of market and present demand for water or power to be supplied shall consider the requirements set forth under OAR 690-315-0040(4)(a-f). In accordance with OAR 690-315-0040(4), the Department shall consider, but is not limited to, the following factors when determining the market and the present demand for water or power to be supplied:

- *(a) The amount of water available to satisfy other affected water rights and scenic waterway flows;*
- *(b) Special water use designations established since permit issuance, including but not limited to state scenic waterways, federal wild and scenic rivers, serious water management problem areas or water quality limited sources established under 33 U.S.C. 1313(d);*

- *(c) The habitat needs of sensitive, threatened or endangered species, in consultation with the Oregon Department of Fish and Wildlife;*
- *(d) Economic investment in the project to date;*
- *(e) Other economic interests dependent on completion of the project; and*
- *(f) Other factors relevant to the determination of the market and present demands for water and power.*

OAR 690-315-0040(4)(a)

The amount of water available to satisfy other affected water rights and scenic waterway flows.

24. A review of the amount of water available to satisfy other affected water rights and scenic waterway flows was determined at the time of issuance of Permit G-17966; furthermore, water availability for other affected water rights and scenic waterway flows after the permit was issued is determined when an Application for a new water right is submitted.

OAR 690-315-0040(4)(b)

Special water use designations established since permit issuance, including but not limited to state scenic waterways, federal wild and scenic rivers, serious water management problem areas or water quality limited sources established under 33 U.S.C. 1313(d).

25. The points of appropriation for Permit G-17966, are located in the Greater Harney Valley Groundwater Area of Concern (GHVGAC) which was established to ensure that groundwater in the GHVGAC is appropriated within the capacity of the resource and that new appropriations of groundwater assure the maintenance of reasonably stable groundwater levels and prevent depletion of the groundwater resource. Current data, comprising substantial evidence, indicate that groundwater levels are declining in areas of the GHVGAC. Additional allocation of groundwater within the GHVGAC may exacerbate these declines. A comparison between estimated annual recharge and previously allocated groundwater volumes indicates that groundwater is fully allocated in some areas of the basin. 690-512-0020(1).
26. Rock Creek is not located within or above any state or federal scenic waterway.
27. The points of appropriation are not located in an area listed by the Department of Environmental Quality as a water quality limited stream.

OAR 690-315-0040(4)(c)

The habitat needs of sensitive, threatened or endangered species, in consultation with the Oregon Department of Fish and Wildlife.

28. Rock Creek is located within an area ranked “low” for stream flow restoration needs as determined by the Department in consultation with the Oregon Department of Fish and Wildlife, and is located within a Sensitive, Threatened or Endangered Fish Species Area as identified by the Department in consultation with Oregon Department of Fish and Wildlife.

OAR 690-315-0040(4)(d)

Economic interests dependent on completion of the project.

29. An approximate total of \$893,725 has been invested in the project.

OAR 690-315-0040(4)(e)

Other economic interests dependent on completion of the project.

30. The Application identifies other economic interests that may be dependent on completion of the project. The permit holder has employees to work the farm. Not having the additional groundwater for irrigation would reduce the workload for employees and reduce their pay. It may also jeopardize one or more positions.

OAR 690-315-0040(4)(f)

Other factors relevant to the determination of the market and present demand for water and power.

31. No other factors relevant to the determination of the market and present demand for water and power have been identified.

Fair Return Upon Investment [OAR 690-315-0040(2)(f)]

32. The Application identifies that a fair return on investment would be realized once development is complete as the crops raised and harvested would generate revenue for the farm.

Other Governmental Requirements [OAR 690-315-0040(2)(g)]

33. Delay in the development of this project was not caused by any other governmental requirements.

Unforeseen Events [OAR 690-315-0040(2)(h)]

34. Unforeseen events were identified that contributed to the extended the length of time needed to fully develop and perfect Permit G-17966, in that the permit holder was misinformed by the Department of the specified date for completion of construction and complete application of water under Permit G-17966.

35. The history of water right transactions, orders and superseding permits that preceded the issuance of Superseding Permit G-17966, made many modifications to the original Permit G-17037, including cancelation of 306.7 acres, and the change in point of appropriation from Well #15, to Well #16. Permit G-17966, issued on January 31, 2018, includes the statement, "(c)ompletion of construction and application of the water shall begin within five years of permit issuance."

The Department has determined that, though there was confusion communicated to the permit holder in regard to the date specified for completion of construction and application of water,

which could have lead the permit holder to believe that the date for completion of construction and application of water to the use was January 31, 2023, that confusion does not affect the statutory requirement to begin construction within five years from the date of approval of the application. The requirement specified by ORS 537.630(2), to prosecute construction of the well within the time fixed in the permit, not to exceed five years after the date of approval of the application, remains applicable.

Denial of the Extension Will Result in Undue Hardship [OAR 690-315-0040(2)(i)]

36. The Application identifies that a considerable investment has been made in the project to date. The purchase price of the property was based in part on having developable water right permits, which were only approximately 20% developed at the time of purchase. Because the permit holder misunderstood the date specified for completion of construction and application of the water, they did not realize that they had less than one year to complete the project. A denial of the Extension of Time will result in the loss of the water under the permit.

Good Faith of the Appropriator [OAR 690-315-0040(2)(c)]

37. The Application does not provide evidence of good faith of the appropriator under Permit G-17966, because the Application does not provide evidence of construction of any well authorized under the permit prior to May 2, 2018, or prior to May 7, 2019, being the date the Application was submitted to the Department.

Based on Findings of Fact 10, 11, 12, 13, 14, 16, 17, 18, 19, 20, 21, and 22, above, the Department finds that the Applicant has not demonstrated good faith.

Duration of Extension [OAR 690-315-0040(1)(c)]

Under OAR 690-315-0040(1)(c), in order to approve an extension of time for water use permits the Department must find that the time requested is reasonable and the applicant can complete the project within the time requested.

38. As of May 7, 2019, the remaining work to be completed consists of requesting a Permit Amendment to change the points of appropriation from the locations authorized in the permit, to the locations the wells are constructed, completing construction of the remaining wells, completing construction of the water system, meeting all permit conditions, which include installing totalizing flow meters, submitting annual water use reports, submitting annual March static water level measurements, equipping all production wells with dedicated measuring tubes, and gaining approval of the location and construction of the Monitoring Well prior to the use of any water under the permit; and applying water to full beneficial use.

Based on FOF 10, 11, 12, 13, 14, and 16, the Department cannot find that the applicant can complete the project or apply water to full beneficial use within the time requested for the extension because the applicant did not begin construction of the wells authorized under the permit within the time allowed in the permit (5 years from the approval of the application).

Good Cause [OAR 690-315-0040(1)(d)]

The Department must find that there is "good cause" to approve the extension. In making a "good cause" finding, the Department shall consider the requirements set forth under OAR 690-315-0040(2).

The Department has considered the reasonable diligence and good faith of the appropriator, the cost to appropriate and apply water to a beneficial purpose, the market and present demands for water to be supplied, the financial investment made and fair and reasonable return upon the investment, the requirements of other governmental agencies, and unforeseen events over which the permit holder had no control, whether denial of the extension will result in undue hardship to the applicant and whether there are no other reasonable alternatives for meeting water use needs, any other factors relevant to a determination of good cause, and has determined that the applicant has not shown that good cause exists for an extension of time to complete construction and apply water to full beneficial use pursuant to OAR 690-315-0040(1)(d).

CONCLUSIONS OF LAW

1. The permit holder has submitted a complete extension application form and the fee specified in ORS 536.050, as required by OAR 690-315-0040(1)(a).
2. The permit holder has not complied with the time allowed for construction work under the permit pursuant to ORS 537.630 as required by OAR 690-315-0040(1)(b) and OAR 690-315-0040(5).
3. The Application established that there has not been reasonable diligence toward developing the project. The permit holder has not shown that good cause exists for an extension of time to complete construction and apply water to full beneficial use pursuant to OAR 690-315-0040(1)(d).

PROPOSED ORDER

Based upon the foregoing Findings of Fact and Conclusions of Law, the Department proposes to issue an order to:

Deny the time to complete construction of the water system under Permit G-17966 from May 2, 2018, to October 1, 2023.

Deny the time to apply water to beneficial use under Permit G-17966 from May 2, 2018, to October 1, 2023.

DATED: June 25, 2019



Dwight French, Administrator,
Water Right Services Division

*If you have any questions,
please check the information
box on the last page for the
appropriate names and
phone numbers.*

Proposed Final Order Hearing Rights

1. Under the provisions of OAR 690-315-0100 and 690-315-0060, the applicant or any other person adversely affected or aggrieved by the proposed final order may submit a written protest to the proposed final order. The written protest must be received by the Water Resources Department no later than **August 9, 2019**, being 45 days from the date of publication of the proposed final order in the Department's weekly notice.
2. A written protest shall include:
 - a. The name, address and telephone number of the petitioner;
 - b. A description of the petitioner's interest in the proposed final order and if the protestant claims to represent the public interest, a precise statement of the public interest represented;
 - c. A detailed description of how the action proposed in the proposed final order would adversely affect or aggrieve the petitioner's interest;
 - d. A detailed description of how the proposed final order is in error or deficient and how to correct the alleged error or deficiency;
 - e. Any citation of legal authority supporting the petitioner, if known;
 - f. Proof of service of the protest upon the water right permit holder, if petitioner is other than the water right permit holder; and
 - g. The applicant or non-applicant protest fee required under ORS 536.050.
3. Within 60 days after the close of the period for requesting a contested case hearing, the Director shall:
 - a. Issue a final order on the extension request; or
 - b. Schedule a contested case hearing if a protest has been submitted, and:
 - 1) Upon review of the issues, the Director finds there are significant disputes related to the proposed agency action; or
 - 2) The applicant submits a written request for a contested case hearing within 30 days after the close of the period for submitting protests.

NOTICE TO ACTIVE DUTY SERVICEMEMBERS: Active duty Servicemembers have a right to stay these proceedings under the federal Servicemembers Civil Relief Act. For more information contact the Oregon State Bar at 800-452-8260, the Oregon Military Department at 503-584-3571 or the nearest United States Armed Forces Legal Assistance Office through <http://legalassistance.law.af.mil>. The Oregon Military Department does not have a toll free telephone number.

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- If you have questions about statements contained in this document, please contact Jeffrey D. Pierceall at (503) 986-0802.
 - If you have questions about how to file a protest or if you have previously filed a protest and you want to know the status, please contact Patricia McCarty at 503-986-0820.
 - If you have any questions about the Department or any of its programs, please contact our Water Resources Customer Service Group at 503-986-0900.
 - Address any correspondence to : Water Right Services Division
725 Summer St NE, Suite A
Salem, OR 97301-1266
- Fax: 503-986-0901
-