



April 14, 2022

Kim French
Oregon Water Resources Department
725 Summer Street NE, Suite A
Salem, OR 97301

RE: Application G-19132 (Permit to Use Groundwater – Bull Springs Ranch, LLC) – Response to Notice of Mitigation Obligation

Dear Kim:

GSI Water Solutions, Inc. (GSI), is submitting the attached response to the Notice of Mitigation Obligation as required by the Department's Initial Review dated March 25, 2022, on behalf of the Application Bull Springs Ranch, LLC.

The Applicant understand that mitigation or offset is required under the Deschutes Basin Groundwater Mitigation rules and has filled out the attached response to NOMO accordingly. However, as we have discussed, Application G-19132 is being processed concurrently with storage application R-89110. Together these two applications provide the Applicant the opportunity to use the stored groundwater for a consumptive use, such as irrigation. As a result, the Applicant is proposing to provide mitigation beyond the required mitigation obligation of 3.8982 acre-feet and intends to provide up to 9 acre-feet of mitigation in order to be prepared for future consumptive use of the stored groundwater.

Finally, Application G-19132 requested use of groundwater for storage in a reservoir for multiple purposes and included the examples of irrigation, recreation and wildlife. However, the Initial Review for Application G-19132 identified the authorized uses as storage for only irrigation, recreation and wildlife. We understand that the requested use is consistent with the Deschutes Basin Program, which classifies groundwater for any beneficial use (see OAR 690-505-0400). The Applicant requests the Proposed Final Order identify the authorized uses as was requested in the application (and as allowed under the Deschutes Basin Program).

If you have any questions regarding this application, please contact me at 541-602-5188.

Sincerely,
GSI Water Solutions, Inc.

A handwritten signature in black ink, appearing to read "Adam Sussman".

Adam Sussman
Principal

CC: Todd Taylor, Bull Springs Ranch, LLC

Enclosures: Response to Notice of Mitigation Obligation

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April 14, 2022

OWRD

RESPONSE TO NOTICE OF MITIGATION OBLIGATION
CREDIT OR PROJECT OPTION

A mitigation obligation may be satisfied by obtaining mitigation credits, providing for implementation of a mitigation project, or both (OAR 690-505-0610(2)). Please read and complete this acknowledgment of mitigation obligation and return it to the Department.

Applicant(s): BULL SPRINGS RANCH LLC

Applicant's agent (if applicable): ADAM SUSSMAN, GSI WATER SOLUTIONS

Application number: G-19132

Proposed Use: STORAGE FOR IRRIGATION, RECREATION, AND WILDLIFE

Period of Use: JANUARY 1 THROUGH DECEMBER 31

Rate requested: 0.24 CUBIC FOOT PER SECOND

Volume requested: 9.0 ACRE-FEET

Mitigation Obligation: 3.8982 ACRE-FEET (Please see attached cover letter)

Zone of Impact: Middle Deschutes River Zone of Impact (located anywhere in the Middle Deschutes Basin above river mile 125)

Please read and initial the following statements:

 X I/We intend to provide mitigation in the amounts noted above and in the appropriate zone of impact.

 X I/We understand that mitigation must be provided within five years of issuance of the final order.

The source of mitigation water will be (please check): See below.

 Purchase mitigation credits and / or A mitigation project resulting in credits

Please describe the type of project (e.g., transfer, etc.) and any associated water-right certificate, if known:

Prior to a final order on Application G-19132 or within 5 years of the final order being issued we intend to provide mitigation credits or offset as authorized OAR 690-505-0610(8).

I understand that I must provide mitigation credits in the amount noted, or a suitable replacement mitigation that meets the requirements of OAR 690-505-0610(2)-(5) in the appropriate zone of impact.

Applicant(s)

Bull Springs Ranch, LLC

Attention Todd Taylor



Todd Taylor

or

Applicant's agent

Date 4/14/2022

Telephone Number:

Mail to: Attn: Kim French
Oregon Water Resources Department
725 Summer St NE Suite A
Salem OR 97301-1266

OR

Email to: Kim.R.French@water.oregon.gov