

Special Area Well Construction Standards  
Petes Mountain & Eola Hills GWLA  
WRD Response to Comments  
May 30, 2008

- Oppose the additional casing and sealing requirement to within 100 feet of the bottom of the hole in the Eola Hills Ground Water Limited Area. Standards already exist addressing the commingling issue so no additional requirements are necessary to minimize the chance of commingling.

*Response:* The Department developed this proposed standard to prevent the draining of an upper Columbia River Basalt interflow aquifer into a lower one to protect senior surface water users. Adding the special area well construction standard for the Eola Hills Ground Water Limited Area does clarify the casing and sealing requirement in this geographic area. Staff does not recommend modification to the proposed rule.

- Oppose the proposed language requiring that all new, altered, deepened or converted wells constructed be cased and sealed in accordance with OAR 690 Division 210.

*Response:* Special area well construction standards are additional construction standards that apply in specific geographic areas. All the minimum well construction standards still apply and by adding a cross reference to the section specific to special area well construction standards adds clarity. Staff does not recommend modification to the proposed rule.

- Add another figure to further illustrate how the dedicated measuring tube would be installed with a pitless adapter. Should be able to use poly pipe instead of pvc for the dedicated measuring tube. The inside diameter of the dedicated measuring tube should be 0.750 to allow for industry standard transducer clearance.

*Response:* Figure 200-5, Measuring Tube Diagram and Specifications, was developed in conjunction with the Driller's Technical Committee. Staff does not recommend modification to the proposed rule.

- There should be a requirement so no one uses less than 4-1/2 inch liner pipe.

*Response:* Figure 200-5, Measuring Tube Diagram and Specifications, was developed in conjunction with the Driller's Technical Committee. Staff does not recommend modification to the proposed rule.

- In Figure 200-5, one cannot determine what would exceed the minimum and some of the terms used in this figure are not what the industry commonly uses.

*Response:* Figure 200-5, Measuring Tube Diagram and Specifications, was developed in conjunction with the Driller's Technical Committee. Staff does not recommend modification to the proposed rule except to reflect terminology that the industry commonly uses.

- Generally, there are superfluous words in the proposed rules and some language lacks clarity.

*Response:* Staff modified some wording and corrected grammatical errors.

- There is a requirement for 6 inch casing in the Petes Mountain Special Area Standard, but no casing requirement in the Eola Hills Ground Water Limited Area.

*Response:* The 6 inch casing requirement was inadvertently omitted from the Special Area Standard for the Eola Hill Ground Water Limited Area. This correction is reflected in the final draft rules (Attachment 1).

- Oppose the ability of the Director to require dedicated measuring tubes on any water supply well if deemed necessary.

*Response:* The Director has the authority to require installation of water use controlling and or measuring devices when necessary for regulation or management of surface water and ground water under OAR Division 250, Water Distribution. Including this language in Division 690-215-0080 provides the landowner an opportunity to become familiar with this requirement through the well construction process rather than through water distribution. Staff does not recommend modification to the proposed rule.

- Drillers should be allowed to use bentonite to abandon all wells and that there should not be a 50 foot limit for the surface seal.

*Response:* This issue was not included in the hearing draft rules in Attachment 1. Staff does not recommend modification to the proposed rule on this issue.