

HARTT Laura A * WRD

From: Bill Bold <billbold@cotse.net>
Sent: Monday, May 20, 2024 5:23 PM
To: WRD_DL_rule-coordinator
Subject: Comment on Proposed Rulemaking

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Ms. Hart,

I would like to submit the following comments on the draft of chapter 690 filed 2/22/24.

In terms of your current draft I feel exempting everything with less than 5 Ft³/sec flow rate in 690-009-0060 4B as way too high. Someone withdrawing water 24 hours a day, 365 days/year will withdraw 157 million gallons/year by my calculations. It seems to me that the aquifer would run dry fairly quickly if everyone started withdrawing water at this rate. In my opinion all water withdrawals should be considered and managed. There should be no exceptions.

I did some work on the Surprise Valley geothermal energy plant in Paisley. In that situation there were 2 underground aquifers. One at 750 feet and the other at 1300 feet depth and (to the best of my knowledge) neither are connected. I don't see any mechanism in your document that can handle this situation accurately. I also do not see any provisions in the current draft that considers the re-injection of the geothermal water back underground.

As a big picture view I see your process as a kluge, a 19th century surface water rights law aimed at farming that was expanded to include aquifers. In other words it doesn't manage aquifers very well, it looks like it treats aquifers similarly to a surface water source. It seems to me in the age of ground penetrating radar, accurate flow meters and computer record keeping the state of Oregon can do better. Maybe this is the time to switch methods and base water rights from aquifers on the size of the reservoir and the inflow of water. The amount of water that can be withdrawn should be based on maintaining the level of the underground aquifer.

Thank you for considering my comments.

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Bill Bold
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