

# MEMO

## State of Idaho

### Department of Water Resources

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**Date:** May 18, 2026  
**To:** Phill Hummer, Water Rights Section Manager  
**Cc:** Craig Saxton, Water Allocation Bureau Chief  
**From:** Jennifer Sukow, P.E., P.G., Hydrology Section  
**Subject:** Cumulative review of ESPA transfers between 2012 and 2025

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In 2019, the Idaho Department of Water Resources (IDWR) began analyzing and reporting the cumulative effect of water right transfers involving pumping from the Eastern Snake Plain aquifer (ESPA). IDWR's report is updated each year. The last analysis included water right transfers approved between January 1, 2012, and September 30, 2024 (Sukow, 2024).<sup>1</sup> This memorandum presents the results of an updated cumulative review including water right transfers approved between January 1, 2012, and September 30, 2025.

Water Allocation Bureau staff identified 28 transfers approved between October 1, 2024, and September 30, 2025, involving PODs located within the Eastern Snake Plain Aquifer Model Version 2.2 (ESPAM2.2) boundary. For each transfer, Water Allocation Bureau staff assigned "TO" and "FROM" well locations to a model row and column. For transfers involving a well location outside of the active model boundary, the well location was assigned to the model row and column of the nearest active model cell. Water Allocation Bureau staff also provided an annual pumping volume for each well. Figure 1 shows the locations of model cells with TO and FROM wells representing the 28 recently approved transfers. Figure 2 shows the cumulative change in annual pumping volume by model cell for the recently approved transfers.

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<sup>1</sup> Sukow, J., 2024. *Cumulative review of ESPA transfers between 2012 and 2024*, Idaho Department of Water Resources, memorandum to Phill Hummer dated December 5, 2024, 12 p., <https://idwr.idaho.gov/wp-content/uploads/sites/2/water-rights/ESPAXferMemo2024final.pdf>.

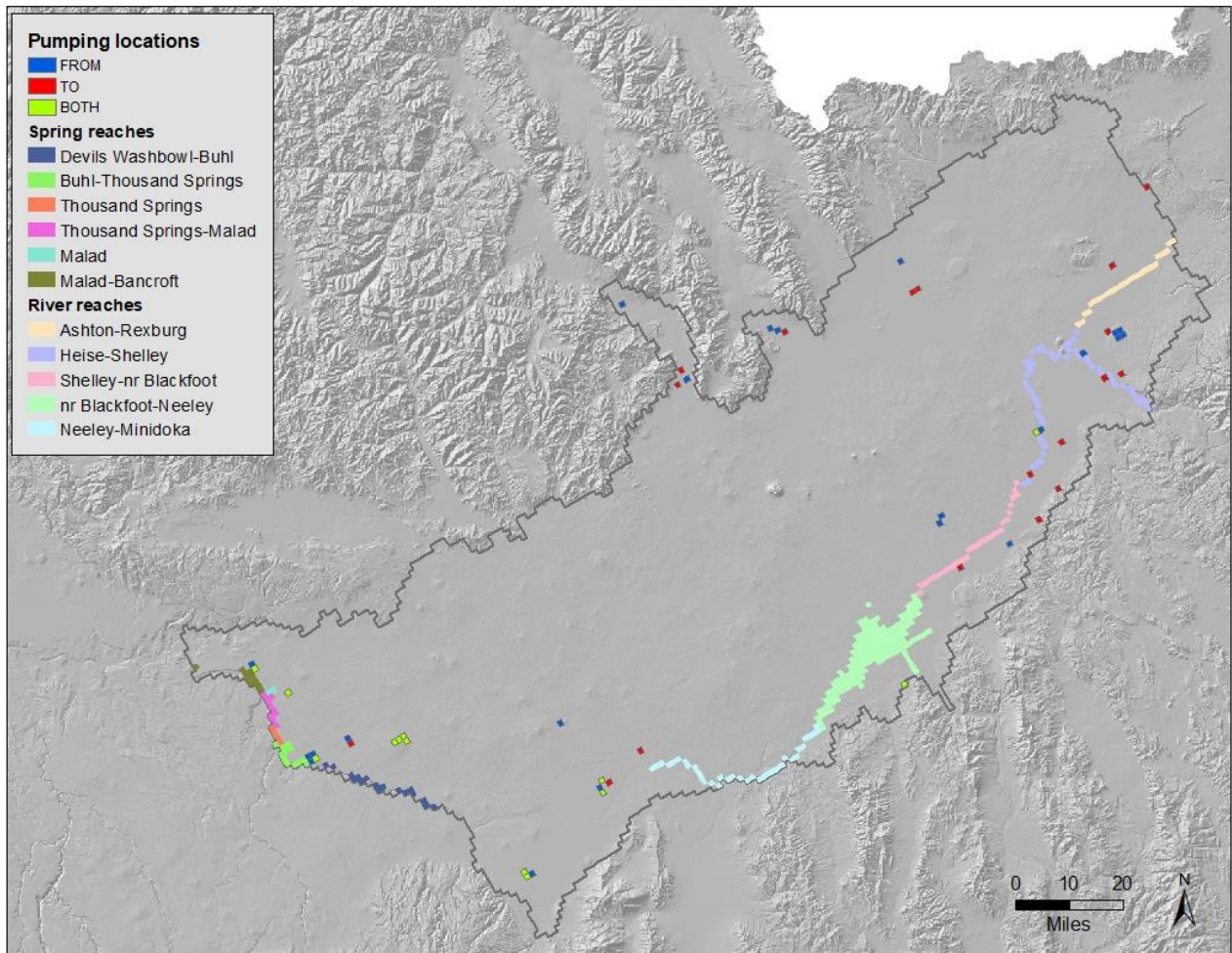


Figure 1. Locations of TO and FROM wells for transfers approved between October 1, 2024, and September 30, 2025

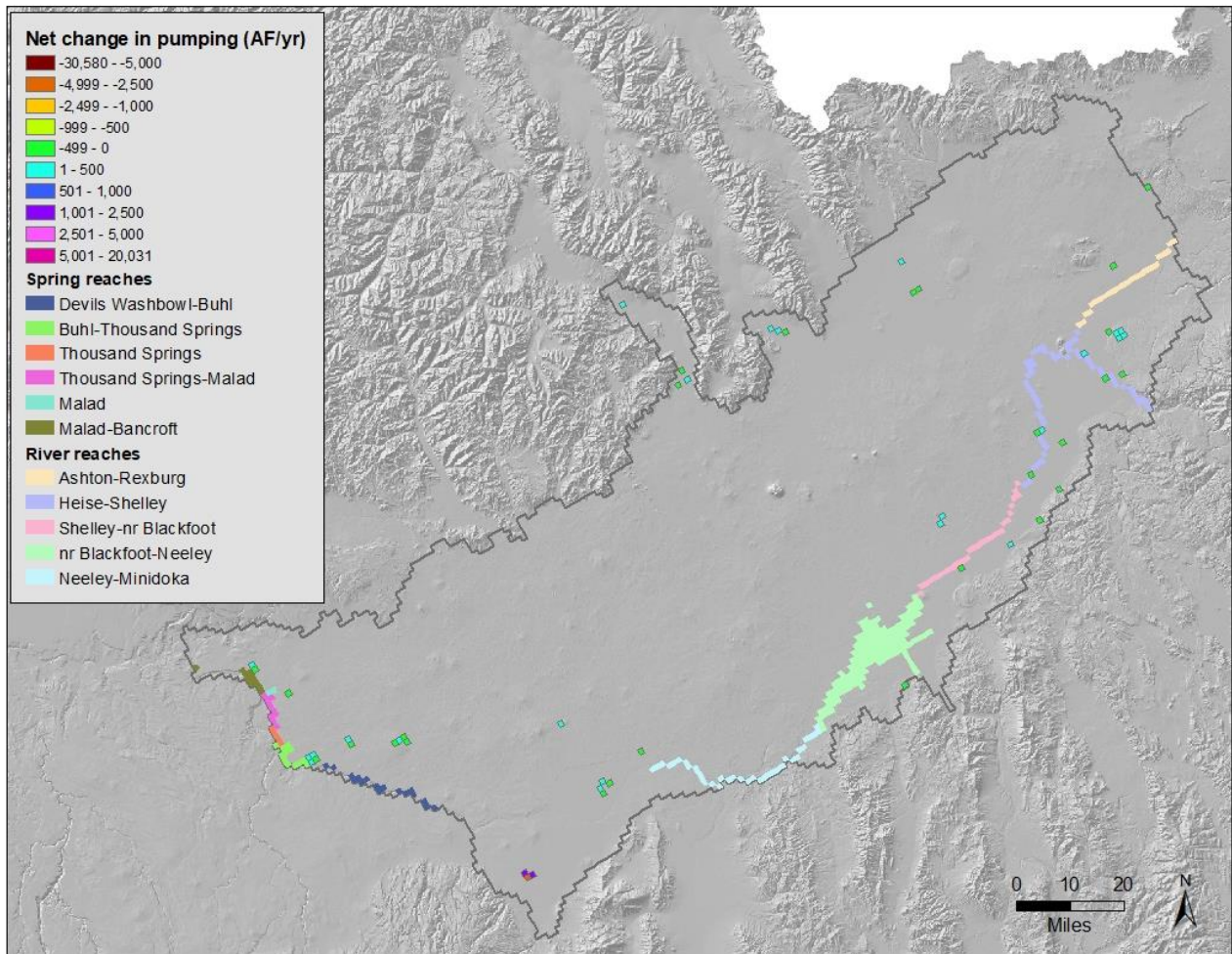


Figure 2. Net change in pumping resulting from transfers approved between October 1, 2024, and September 30, 2025

For the cumulative review, changes in pumping resulting from the recently approved transfers were added to changes in pumping resulting from the 795 transfers analyzed previously in Sukow (2024). The updated analysis includes a total of 823 transfers. Figure 3 shows the locations of model cells with TO and FROM wells representing the transfers approved between January 1, 2012, and September 30, 2025. Figure 4 shows the cumulative change in annual pumping volume by model cell for these transfers.

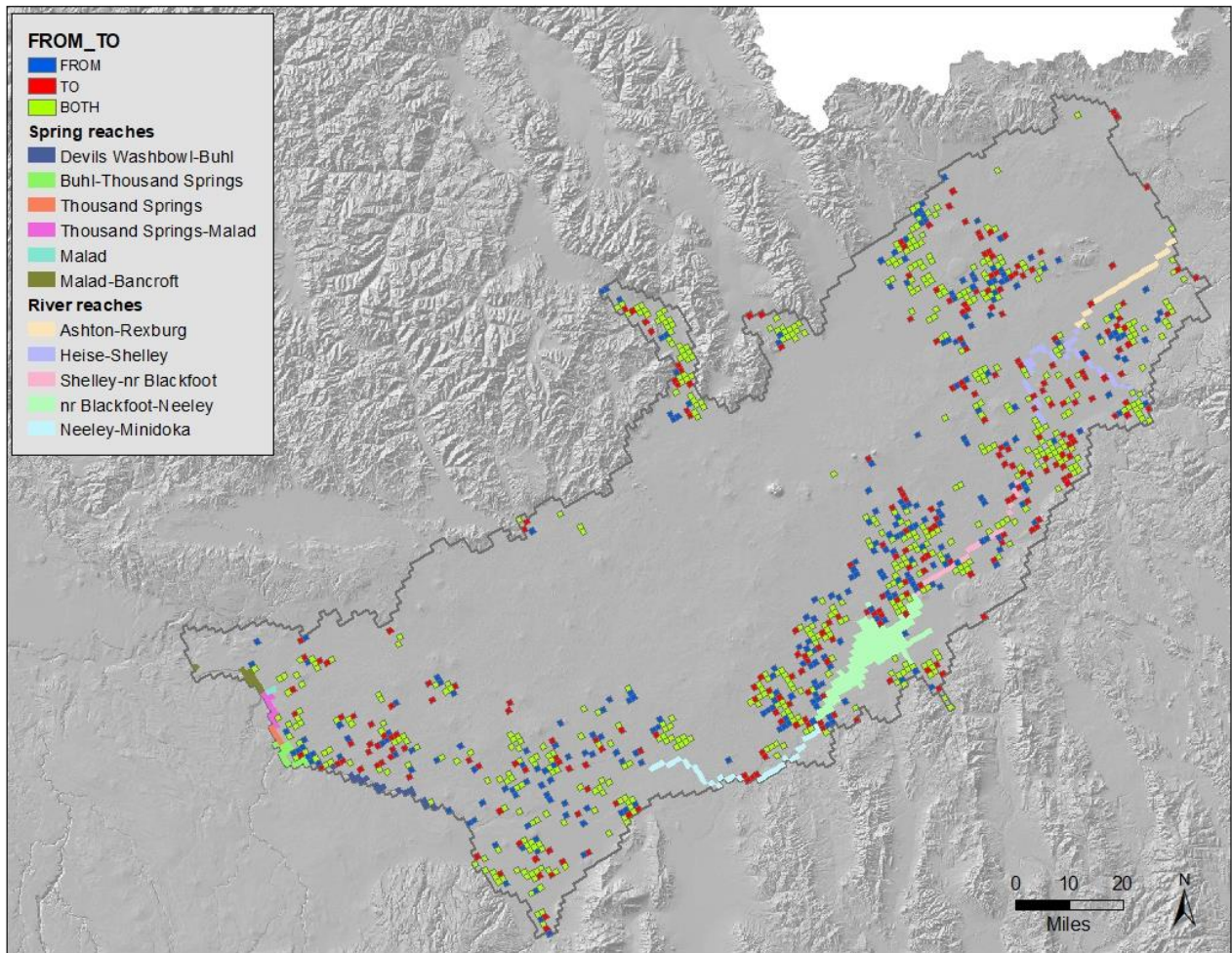


Figure 3. Location of TO and FROM wells for transfers approved between January 1, 2012, and September 30, 2025

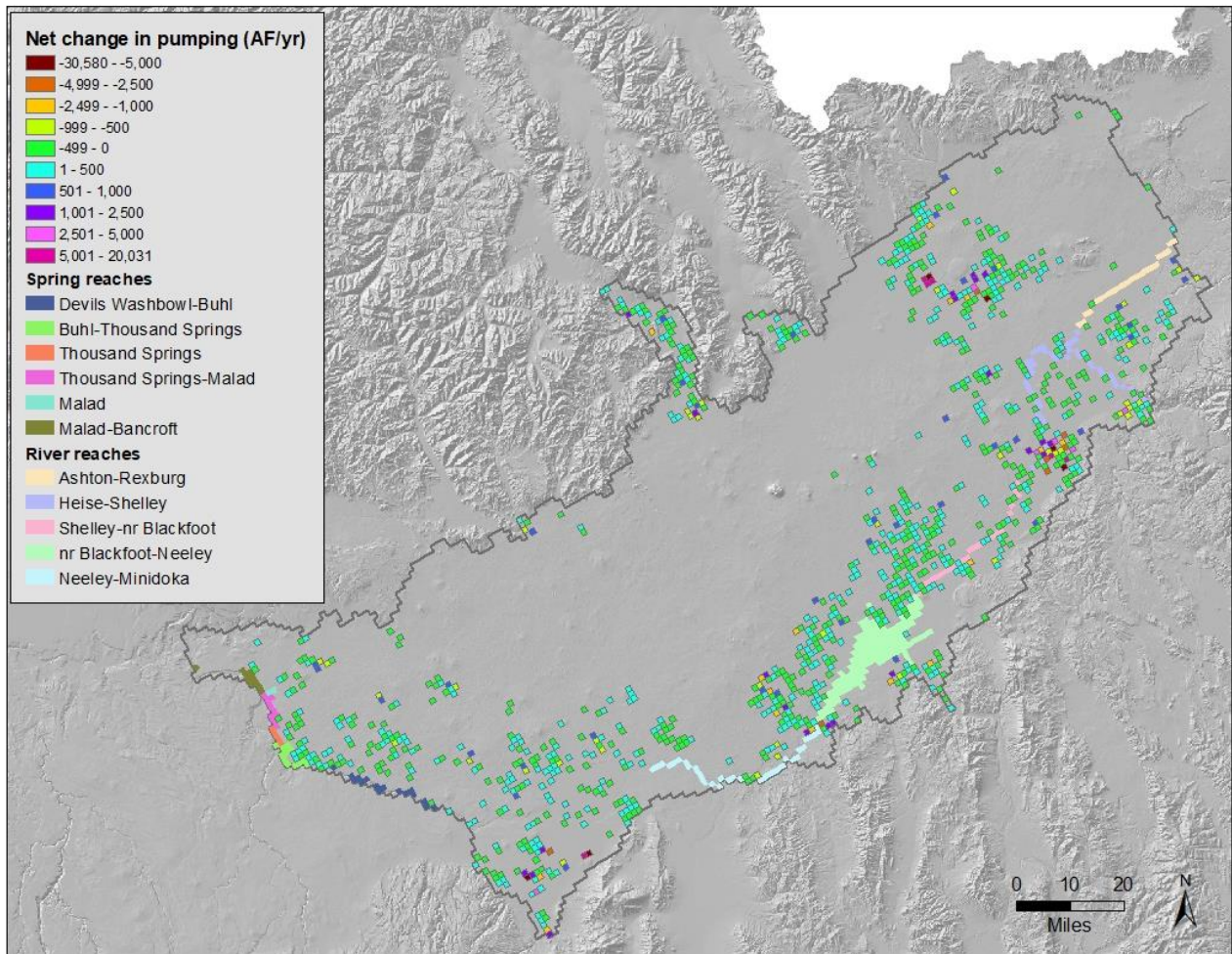


Figure 4. Net change in pumping resulting from transfers approved between January 1, 2012, and September 30, 2025

Most transfers involve relatively small amounts of water (Figure 5) or move points of diversion a relatively short distance (Figure 6). Figure 7 shows the cumulative volume of water transferred by the average distance between TO and FROM wells. Because mitigation was required for some transfers with longer distances, the cumulative TO volumes are less than the cumulative FROM volumes for all categories greater than one mile.

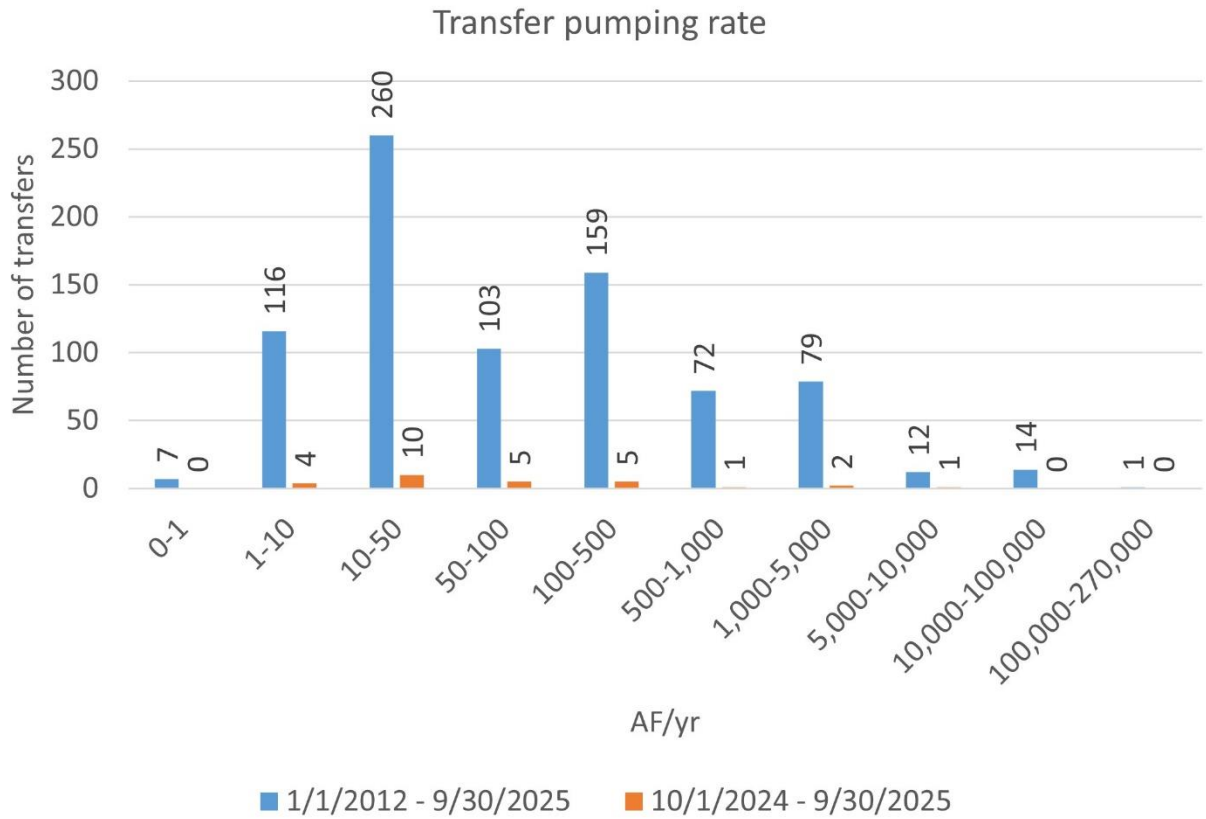


Figure 5. Transfer pumping volume

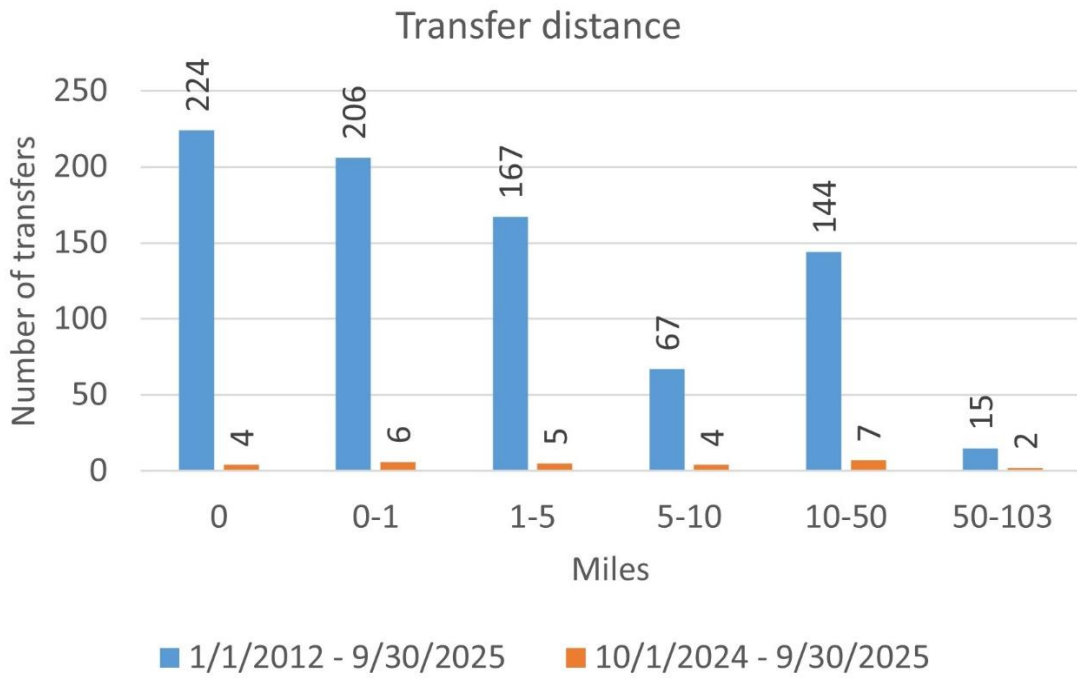


Figure 6. Average distance between TO and FROM wells

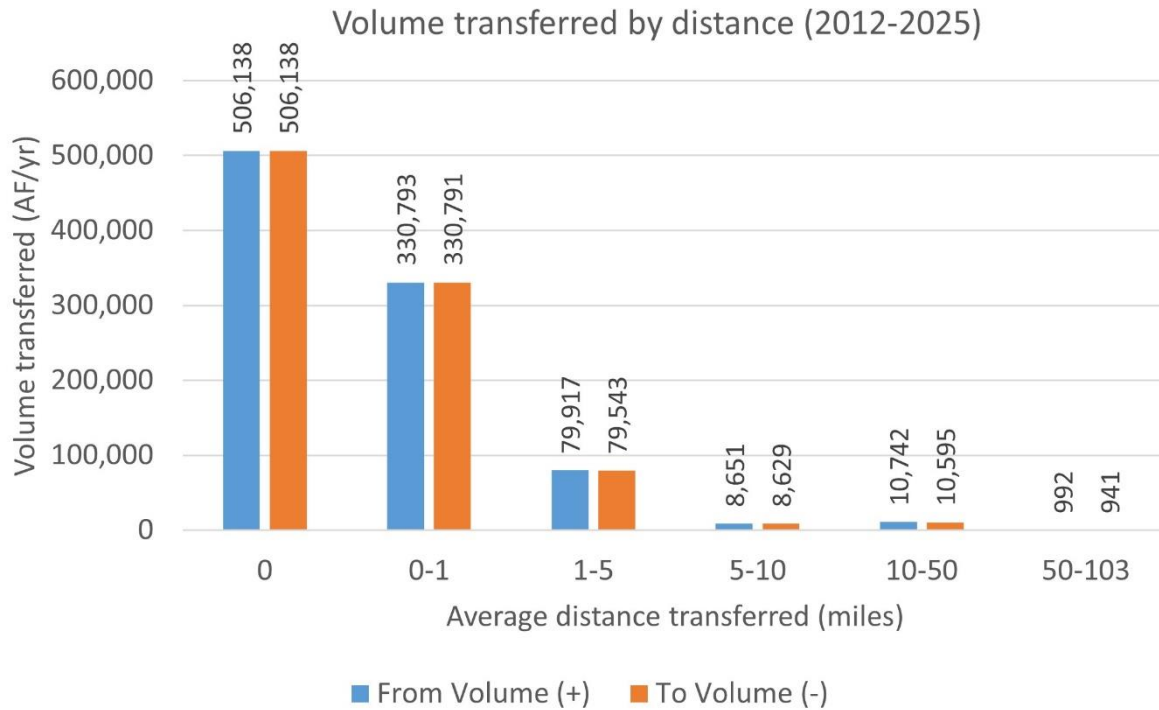


Figure 7. Cumulative volume transferred by distance transferred (1/1/2012 – 9/30/2025)

The Eastern Snake Plain Aquifer Model version 2.2 (ESPAM2.2)<sup>2</sup> was used to simulate the cumulative effects of the transfers on steady-state reach gains equivalent to the reaches represented in the ESPA Model Transfer Spreadsheet (ETRAN), which is commonly used as a tool by transfer applicants and Water Allocation Bureau staff to analyze the hydrologic impacts of individual transfers. ETRAN simulates the effects of changes in pumping location using the ESPAM2.2 groundwater flow model, but the ETRAN user interface only supports the simulation of a limited number of points of diversion. Because the cumulative analysis requires simulation of a large number of points of diversion, ESPAM2.2 was used with other pre- and post-processing tools to perform the analyses.

Transfer data provided by Water Allocation Bureau staff were reformatted to create MODFLOW input files. FROM wells were represented as a positive stress to simulate a decrease in pumping at these locations. TO wells were represented as a negative stress to simulate an increase in

<sup>2</sup> Sukow, J., 2021. *Model Calibration Report, Eastern Snake Plain Aquifer Model Version 2.2*, Idaho Department of Water Resources, May 2021, 226 p., [https://research.idwr.idaho.gov/files/projects/espam/browse/ESPAM22\\_Reports/ModelCalibrationRpt/](https://research.idwr.idaho.gov/files/projects/espam/browse/ESPAM22_Reports/ModelCalibrationRpt/).

pumping at these locations. The superposition version of ESPAM2.2<sup>3</sup> was used to simulate the effects of the changes in pumping at steady state.

The cumulative effect of changes in pumping on reach gains in each of the eleven reaches of the Snake River was extracted from the model output. Results are summarized in Table 1. Changes in reach gains resulting from the transfers are very small compared to average reach gains (less than +/- 1.5%). The largest changes are an increase of 1,928 AF/yr (2.7 cfs) in the near Blackfoot to Neeley reach and a decrease of 932 AF/yr (-1.3 cfs) in the Neeley to Minidoka reach. The cumulative effect on the near Blackfoot to Minidoka reach is an increase of 995 AF/yr (1.4 cfs).

Table 1. Cumulative effect of transfers approved between January 1, 2012 and September 30, 2025 on reach gains in the Snake River

| Reach                          | Transfer Impact |       | Average Reach Gain <sup>4</sup> |       | % change in reach gain |
|--------------------------------|-----------------|-------|---------------------------------|-------|------------------------|
|                                | (AF/yr)         | (cfs) | (AF/yr)                         | (cfs) |                        |
| Ashton-Rexburg                 | 286             | 0.40  | -19,756                         | -27   | 1.450%                 |
| Heise-Shelley                  | -320            | -0.44 | -214,459                        | -296  | -0.149%                |
| Shelley-Near Blackfoot         | -313            | -0.43 | -400,694                        | -553  | -0.078%                |
| Subtotal above nr Blackfoot    | -347            | -0.48 | -634,908                        | -876  | -0.055%                |
| Near Blackfoot-Neeley          | 1,928           | 2.66  | 1,720,822                       | 2,375 | 0.112%                 |
| Neeley-Minidoka                | -932            | -1.29 | 71,706                          | 99    | -1.300%                |
| Subtotal nr Blackfoot-Minidoka | 995             | 1.37  | 1,792,528                       | 2,474 | 0.056%                 |
| Devil's Washbowl -Buhl         | -44             | -0.06 | 787,690                         | 1,087 | -0.006%                |
| Buhl-Thousand Springs          | -37             | -0.05 |                                 |       |                        |
| Thousand Springs               | -4              | -0.01 |                                 |       |                        |
| Thousand Springs-Malad         | 1               | 0.00  |                                 |       |                        |
| Malad                          | 23              | 0.03  |                                 |       |                        |
| Malad-Bancroft                 | 8               | 0.01  |                                 |       |                        |
| Subtotal Kimberly-King Hill    | -53             | -0.07 | 4,248,456                       | 5,864 | -0.001%                |
| Total                          | 596             | 0.82  | 5,406,075                       | 7,462 | 0.011%                 |

<sup>3</sup> Sukow, J., 2021, *Comparison of Superposition Model with Fully-populated Model for Eastern Snake Plain Aquifer Model Version 2.2*, Idaho Department of Water Resources, March 2021, 14 p., [https://research.idwr.idaho.gov/files/projects/espam/browse/ESPAM22\\_Reports/Scenarios/Super\\_FullyPop\\_Final.pdf](https://research.idwr.idaho.gov/files/projects/espam/browse/ESPAM22_Reports/Scenarios/Super_FullyPop_Final.pdf).

<sup>4</sup> Average reach gains were calculated from data compiled for development of ESPAM2.2 for water years 1981 through 2018.

Figure 8 shows the trend in the cumulative effect of transfers approved on or after January 1, 2012, on reaches of the Snake River above Minidoka. For reaches of the Snake River above the near Blackfoot gage, there is not an apparent trend in the cumulative effect of the transfers. For these reaches, the cumulative effect of transfers approved during a given year resulted in increases in reach gains for some years and decreases in reach gains for other years. For the near Blackfoot to Neeley reach, the cumulative effect of the transfers approved during a given year has resulted in a very small increase in reach gains for most years. For the Neeley to Minidoka reach, the cumulative effect of the transfers approved during a given year has resulted in a very small decrease in reach gains for most years. The cumulative effect on the combined near Blackfoot to Minidoka reach has been a very small increase in reach gains for most years. The slope of the trends in the near Blackfoot to Neeley, Neeley to Minidoka, and near Blackfoot to Minidoka reaches was generally greater prior to 2017 than after 2017.

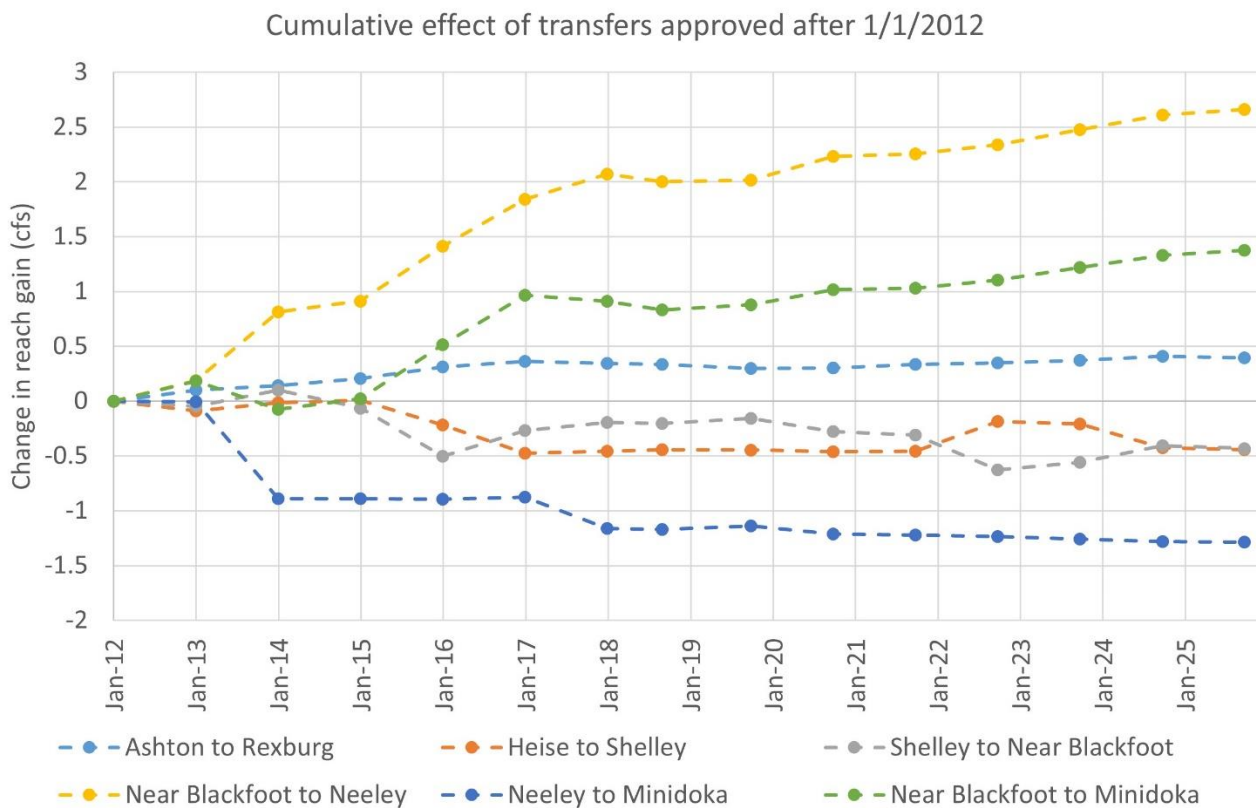


Figure 8. Trend in cumulative effect of transfers approved on or after January 1, 2012, on reaches of the Snake River above Minidoka

Figure 9 shows the trend in the cumulative effect of transfers approved on or after January 1, 2012, on reaches of the Snake River between Kimberly and King Hill. For reaches between Kimberly and King Hill, the cumulative effect of transfers approved during a given year resulted in increases in reach gains for some years and decreases in reach gains for other years. The effect on the Devil's Washbowl to Buhl reach has been a very small decrease in reach gains for eight of the fourteen years. The effect on the Buhl to Thousand Springs reach has been a very small decrease in reach gains for nine of the fourteen years. The total effect on the Kimberly to King Hill reach has been a very small decrease in reach gains for eight of the fourteen years, a very small increase for five of the fourteen years, and near zero impact for one year. In general, the cumulative effect of transfers approved between 2012 and 2018 was a very small increase in Kimberly to King Hill reach gains, and the cumulative effect of transfers approved during water years 2019 through 2025 has been a very small decrease in reach gains.

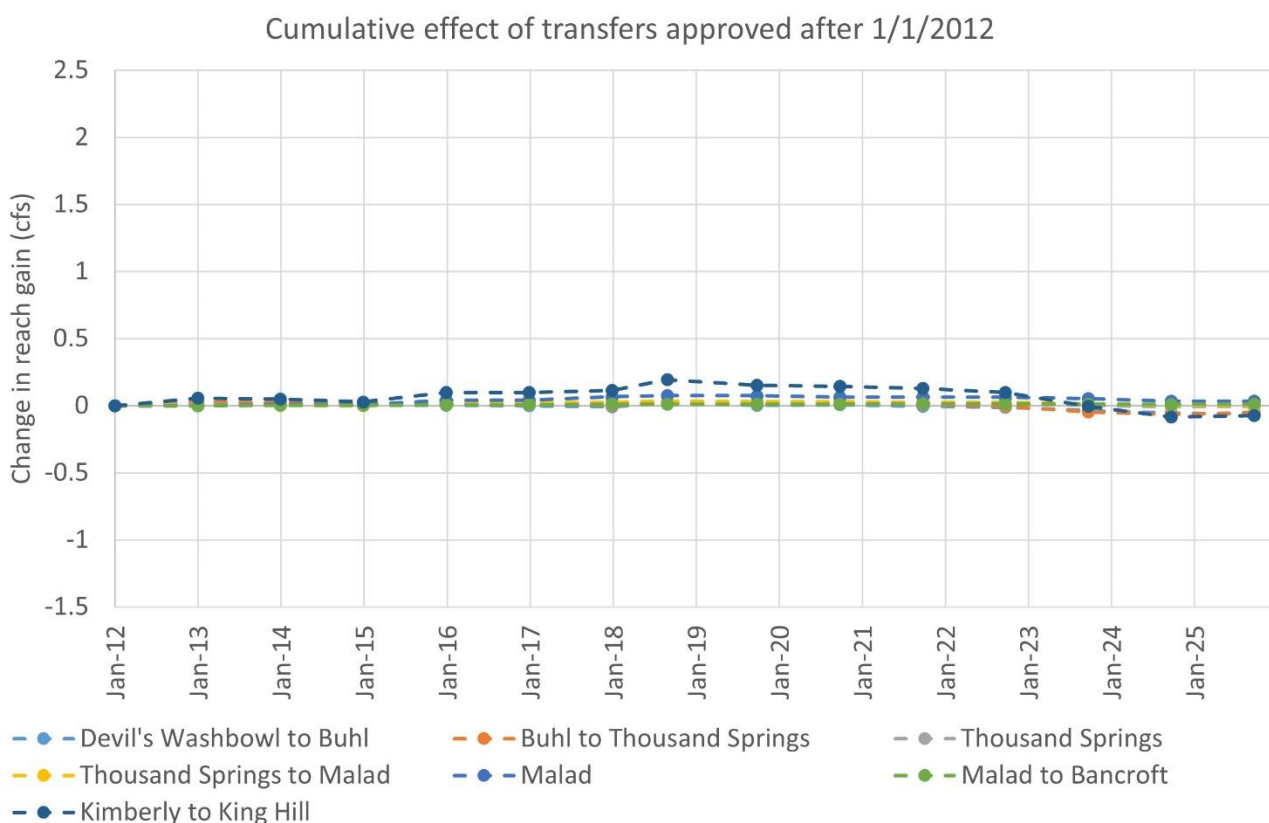


Figure 9. Trend in cumulative effect of transfers approved on or after January 1, 2012, on reaches of the Snake River between Kimberly and King Hill

Of the 823 transfers included in the cumulative analysis, 393 transfers had an average distance of greater than 1.0 mile between the TO and FROM model cell locations (Figure 10). The cumulative effects of these 393 transfers were simulated using the superposition version of ESPAM2.2. Results of the simulation are summarized in Table 2. The results are similar to the results of the simulation that included all of the transfers. Changes in reach gains resulting from the transfers are very small compared to average reach gains (less than  $\pm 1.5\%$ ). The largest changes are an increase of 1,305 AF/yr (1.8 cfs) in the near Blackfoot to Neeley reach and a decrease of 769 AF/yr (-1.1 cfs) in the Neeley to Minidoka reach. The cumulative effect on the near Blackfoot to Minidoka reach is an increase of 536 AF/yr (0.7 cfs).

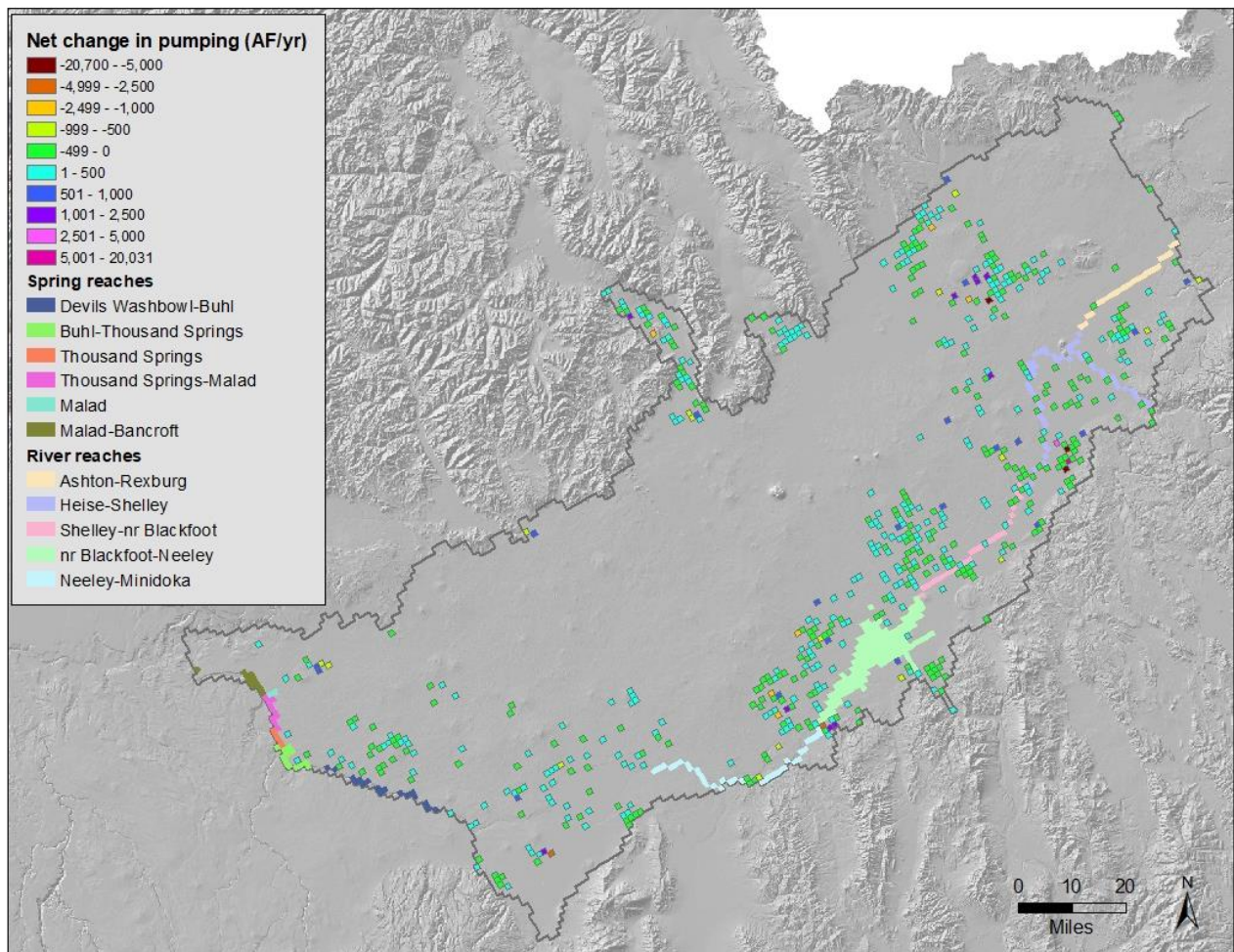


Figure 10. Net change in pumping resulting from transfers with an average distance of greater than one mile (approved between January 1, 2012, and September 30, 2025)

Table 2. Cumulative effects of transfers with an average distance greater than one mile on reach gains in the Snake River (for transfers approved between January 1, 2012, and September 30, 2025)

| Reach                          | Transfer Impact |       | Average Reach Gain |       | % change in reach gain |
|--------------------------------|-----------------|-------|--------------------|-------|------------------------|
|                                | (AF/yr)         | (cfs) | (AF/yr)            | (cfs) |                        |
| Ashton-Rexburg                 | 206             | 0.28  | -19,756            | -27   | 1.044%                 |
| Heise-Shelley                  | 42              | 0.06  | -214,459           | -296  | 0.019%                 |
| Shelley-Near Blackfoot         | -93             | -0.13 | -400,694           | -553  | -0.023%                |
| Subtotal above nr Blackfoot    | 155             | 0.21  | -634,908           | -876  | 0.024%                 |
| Near Blackfoot-Neeley          | 1,305           | 1.80  | 1,720,822          | 2,375 | 0.076%                 |
| Neeley-Minidoka                | -769            | -1.06 | 71,706             | 99    | -1.073%                |
| Subtotal nr Blackfoot-Minidoka | 536             | 0.74  | 1,792,528          | 2,474 | 0.030%                 |
| Devil's Washbowl -Buhl         | -64             | -0.09 | 787,690            | 1,087 | -0.008%                |
| Buhl-Thousand Springs          | -37             | -0.05 |                    |       |                        |
| Thousand Springs               | -12             | -0.02 |                    |       |                        |
| Thousand Springs-Malad         | -4              | -0.01 |                    |       |                        |
| Malad                          | 16              | 0.02  |                    |       |                        |
| Malad-Bancroft                 | 5               | 0.01  |                    |       |                        |
| Subtotal Kimberly-King Hill    | -96             | -0.13 | 4,248,456          | 5,864 | -0.002%                |
| Total                          | 594             | 0.82  | 5,406,075          | 7,462 | 0.011%                 |