

BEFORE THE OREGON WATER RESOURCES DEPARTMENT

IN THE MATTER OF AN INVESTIGATION)	
IN AID OF DISTRIBUTION PURSUANT)	DETERMINATION ON STATUS
TO ORS 540.210)	OF RELEASES OF WATER
)	STORED UNDER
Klamath Irrigation District)	DETERMINED CLAIM KA 294
<i>Petitioner,</i>)	
)	AND NOTICE OF VIOLATIONS
Bureau of Reclamation)	
<i>Reservoir Owner.</i>)	

To: The U.S. Bureau of Reclamation
Jared Bottcher, Acting Area Manager
6600 Washburn Way
Klamath Falls, OR 97603-9365

NOTICE: This is a Final Order other than contested case. This Order is subject to judicial review under ORS 183.484. Any petition for judicial review must be filed within the 60-day time period specified by ORS 183.484(2). Pursuant to ORS 536.075 and OAR 137-004-0080 you may either petition for judicial review or petition the Director for reconsideration of this Order. A petition for reconsideration may be granted or denied by the Director, and if no action is taken within 60 days following the date the petition was filed, it shall be deemed denied.

I. BACKGROUND

Pursuant to the order of the Marion County Circuit Court dated October 13, 2020 ¹ (*Klamath Irrigation District v. Water Resources Department* (20CV15606)) the Oregon Water Resources Department (Department) must determine whether water that is passing through the Link River Dam is water stored pursuant to Determined Claim KA 294. This Determination and Notice of Violations provides the status of water released from Upper Klamath Lake (UKL) between June 25, 2021 and July 26, 2021, and notifies the U.S. Bureau of Reclamation (Bureau) of those instances during this period in which it violated the terms of the Oregon Water Resources Department’s ORDER REGARDING RELEASE OF WATER STORED UNDER DETERMINED CLAIM KA 294 dated April 6, 2021 (Order).

¹ The October 13, 2020 Order directed the Watermaster to:

“* * * immediately stop the distribution, use and/or release of Stored Water from the UKL [Upper Klamath Lake] without determining that the distribution, use and/or release is for a permitted purpose by users with existing water rights of record or determined claims to use the Stored Water in UKL.

The term “existing water rights of record” has the meaning provided in ORS 540.045(4). The term “determined claim” has the meaning provided in Section 1, chapter 445, Oregon Laws 2015 (which is published in the Oregon Revised Statutes as a note following ORS 539.170).

II. REGULATION OF DETERMINED CLAIMS

ORS 540.145 authorizes the Water Resources Commission to adopt rules to “secure the equal and fair distribution of water in accordance with the rights of the various users” which rules “shall apply to all water rights that have been established * * * “[u]nder an order of the Commission or the Water Resources Director in proceedings for the determination of relative rights to the use of water * * *.” The rules of the Commission authorizing the distribution of Determined Claims in the ACFFOD² to secure the equal and fair distribution of water in accordance with the rights of the various users are provided in Oregon Administrative Rules (OAR) Chapter 690 Division 250.

A “reservoir” includes a modified natural lake such as UKL, in which water is collected for beneficial use or purpose.³ “Legally stored water” means any “water impounded in a reservoir under the provisions of an established right to store water.”⁴ Use of legally stored water is governed by the water rights that may call on that source of water and is limited to that amount of water that may be put to beneficial use without waste.⁵ Any legally stored water that is in excess of the needs of the water rights calling on that stored water is considered “natural flow” which may be diverted according to the next water right in priority or is once again public water subject to appropriation.⁶

III. FINDINGS OF FACT

A. KA 294 and KA 1000

1. The Bureau’s Klamath Project (Project) was established in accord with federal legislation and state legislation in 1902 and 1905, respectively. The Bureau built and owns the facilities, known as the works in the Project area. UKL is a modified natural lake and is one of the three reservoirs in the Project which also comprises eight dams, five major pumping plants, 19 canals, and other works.
2. The Bureau is the sole owner of Determined Claim KA 294. KA 294 provisionally authorizes the Bureau to store a maximum annual volume of 486,828-acre feet (AF) of water in UKL between elevations 4,136 feet and 4,143.3 feet, relative to the Bureau’s Klamath Basin Datum.
3. The volume of water stored in UKL above elevation 4,136 is estimated based on an elevation capacity curve, or rating, provided by the Bureau, and using the weighted mean lake level as

² The term “ACFFOD” refers to the Amended and Corrected Findings of Fact and Order of Determination. The ACFFOD is the Director’s order of determination regarding claims filed in the Klamath Adjudication and is currently under review in the Klamath County Circuit Court. Pursuant to ORS 539.170 while the ACFFOD is pending before the Circuit Court, the “division of water from the stream involved in the appeal shall be made in accordance with the order of the Director.”

³ OAR 690-250-0010(13); Modifications of the outlet of UKL along with the construction of the Link River Dam around 1916 allow the UKL to be operated and managed as a reservoir between the elevations of 4136 and 4143.3.

⁴ OAR 690-250-0010(10).

⁵ OAR 690-250-0010(3); *Bennett v. City of Salem*, 192 Or 531, 543 (1951)(An appropriator is never entitled to divert more water than is actually put to beneficial use, reasonable transmission losses excepted); *In re Water Rights of Deschutes River and Tributaries*, 134 Or 623, 644 (1930) (“The right of a prior appropriator is paramount, and the right is limited to such an amount of water as is reasonably necessary for such use and project as may be fairly within contemplation at the time the appropriation is made); *Tudor v. Jaca*, 178 Or 126, 143 (1945) *citing Bolter v. Garrett*, 44 Or 204 (1904) for the proposition that the use of water appropriated “must not only be beneficial to the lands of the appropriator, but it must also be reasonable in relation to the reasonable requirements of subsequent appropriators.”

⁶ OAR 690-250-0150(4); *Jones v. Warm Springs*, 162 Or 186, 195 (1939) (Water discharged to the natural stream with no intent to recapture it becomes part of the natural stream and is subject to reappropriation).

reported by the United States Geological Survey (USGS). The most recent rating provided by the Bureau indicates the maximum storage volume for KA 294 (486,828 AF) is met when the lake elevation is at 4,142.48 feet.⁷

4. The KID and 20 other Klamath Project Water Users (together the KPWU) and the Bureau are co-owners of Determined Claim KA 1000. KA 1000 provisionally authorizes the diversion of natural flow from UKL and water stored in UKL pursuant to KA 294 for beneficial use by the KPWU both upstream and downstream of the Link River Dam.⁸ KA 1000 does not specify what amount of water must be taken from natural flow as opposed to stored water and does not prohibit the taking of water from both sources simultaneously.
5. Pursuant to KA 1000, KID may divert up to 1,150 cubic feet per second (cfs) through the A - Canal for irrigation during the irrigation season March 1 through October 31, with a priority date of May 19, 1905.
6. The Link River Dam is a federally owned dam located on the Link River. The storage and release of water pursuant to KA 294 from UKL is through the Link River Dam.
7. Downstream of the Link River Dam, and pursuant to KA 1000, there are 34 authorized points of diversion from the Klamath River. Many of these diversions have an authorized season of use from March 1 to October 31, and two irrigation districts also maintain an additional season of use from November 1 to February 28. These 34 points of diversion have a total authorized instantaneous maximum diversion rate of 1,572.51 cfs.

B. Determining Water Stored in UKL Pursuant to KA 294

1. Calculating Storage Release

8. The equation the Department is using to calculate stored water releases is:

$$\{eqn 1\} \textit{Storage Release} = \textit{Link River Flow} - (\textit{UKL Inflows} - \textit{UKL Diversions})$$

with the storage release in excess of water rights then calculated as:

$$\{eqn 2\} \textit{Excessive Storage Release} = \textit{Storage Release} - \textit{Downstream Storage Diversion}_{KA1000}$$

If either equation results in a zero or negative value, then no storage release unrelated to water rights is occurring.

⁷ The weighted mean lake level of UKL is monitored and reported by the USGS. Four separate lake stage gages are operated and maintained by the USGS, and the data from each gage are entered into an equation to calculate the weighted mean lake elevation. The provisional lake elevation data are available at the website: https://waterdata.usgs.gov/or/nwis/uv/?site_no=11507001&agency_cd=USGS

⁸ KA 1000 erroneously refers to KA 293, but this is a typographical error.

Description of the Variables Used in the Equation:

Link River flow data are available from a USGS stream gage (USGS 11507500) operated on the river. The Keno power canal began diverting flow on 04/28/2021. The diversion starts at Link River Dam and the diverted water enters the Link River below the Link River stream gage. The Keno power canal diversion was added to the Link River flow to get the total outflow to the Klamath River from Upper Klamath Lake.

UKL inflows represent the total amount of *natural flow* coming into the lake from surface water, groundwater, and precipitation. Some of these inflows are measured directly (e.g., Wood and Williamson River stream gages) while others must be estimated (e.g., groundwater inflows) as explained below.

UKL Diversions: The largest UKL Diversion, the A - Canal, is monitored by a gage accessible at this link:

<https://www.usbr.gov/pn-bin/wyreport.pl?site=acho¶meter=qj&head=yes>

There are 12 authorized points of diversion from UKL above the Link River Dam included in KA 1000. Additionally, there are ten state certificated water rights and eight non-KA 1000 determined claims each exceeding one cfs for the use of natural flow from UKL. These 18 non-KA 1000 water rights and determined claims have a combined total of 23 authorized points of diversion from UKL. Because many of these points of diversion do not have measuring devices installed, their diversion rates are estimated using the authorized diversion rate on the determined claim or water right, estimations provided by the water user, or measured by Watermaster staff.⁹

Downstream Storage Diversions KA1000: Gages monitor three of the KA 1000 diversions below UKL; the Lost River Diversion Channel (LRDC), the North Canal, and the Ady Canal. There are 34 authorized points of diversion identified under the KA 1000 below the Link River Dam and approximately 61 other diversions from the Klamath River downstream of the Link River Dam not associated with KA 1000. The unengaged diversions and individual pump diversions are currently estimated as described below (see footnote 9).

The estimated unengaged diversions between Link River Dam and Keno Dam, which are not part of equation 2, were updated on May 17, 2021 based on the water balance between those two sites from the gages monitoring inflows and outflows in the reach. The large number of diversions, inability to access these diversions, and lack of measuring devices made direct measurements of the diversion amounts impractical. This reach showed a neutral water balance (no unaccounted-for difference in flow between Link River Dam and Keno Dam) until the irrigation season started, at which time a negative water balance was calculated similar in magnitude to the theoretical diversion rate of the water rights in the reach. A 7-day moving average of the daily water balance is used to estimate the daily diversions to account for gaging uncertainty, travel time for water between the beginning and end of the reach, and ability of the channel to temporarily store and release water.

Both gaged and unengaged diversions below Link River Dam have been taking natural flow as no storage releases have occurred and the water rights allow for these users to divert natural flow.

⁹ Efforts are underway to develop a more sophisticated mechanism of estimating these numerous smaller users that divert water directly from UKL, including inventorying each POD and working with the landowner to install measuring devices.

2. Calculating Inflows

9. To manage the water rights and determined claims and distinguish between natural flow and stored water, the Department must quantify gross inflows to UKL. Table 1 contains measured inflows (all reported in cubic feet per second) between June 25, 2021 and July 26, 2021.
10. Stream tributaries constitute one component of inflow that contributes to UKL. Tributary inflows include the Williamson River, Wood River, Sevenmile Creek, Crystal Creek, Thomason Creek, and Fourmile Creek. These streams and their tributaries are listed as sources on KA 294.¹⁰
11. Groundwater contributions and direct precipitation are also estimated inflow contributions that contribute to UKL. Table 1 includes estimates of groundwater inflow¹¹ and direct precipitation into the UKL.¹²
12. Ungaged tributary inflows are also estimated inflow contributions to UKL. A constant ungaged inflow estimate for the ungaged tributaries (approximately 60 cfs) was implemented for the daily water distribution determination based on the average inflows from these tributaries observed in a USGS water budget study of the lake (Hubbard, 1970). At the issuance of the present Determination, the ungaged inflow estimate was updated (226 cfs) based on the lake water balance reconciliation process as described in section 3.0 and equation 2 and applied retroactively backwards to the previous Determination. By using this approach, large swings in the daily gross inflow estimate are avoided, thereby reducing the need for large daily (or sub-daily) changes in water management unrelated to changes in actual hydrologic conditions.

¹⁰ Gaged inflow streams include the Williamson and Wood Rivers, and Sevenmile Creek. On November 5, 2020, the Department issued a FINAL ORDER MEASURING DEVICES to the Bureau requiring installation of measuring devices on Sevenmile Creek, Thomason Creek, Fourmile Creek, and Crystal Creek. On December 30, 2020, the Bureau requested reconsideration of this Order, and on February 23, 2021 the Department notified the Bureau that it is reconsidering its Order. At the time of the issuance of this Order, the Department is working with the Bureau to evaluate the viability of installing gages on Crystal Creek and Fourmile Creek.

¹¹ Groundwater contributions are based on USGS estimates and adjusted for current hydro-climate conditions.

¹² Precipitation is scaled from the average daily precipitation recorded at the two USBR AgriMet sites KFLO and AGKO located north and south of the lake. The scaling is based on the PRISM precipitation data set ratio of the lake areal average compared to the two AgriMet sites and results in an approximately 14% increase from the recorded average values at the AgriMet sites.

Upper Klamath Lake Inflows (CFS)							
DATE	USGS Gage 11504115 Wood River	USGS Gage 11504290 Sevenmile at Dike Rd	USGS Gage 11502500 Williamson	GW Inflow Estimate	Fourmile, Crystal Creek & Other Ungaged Tributaries	Precipitati on	Total Inflow to UKL
6/25/2021	331	16	483	224	226	0	1280
6/26/2021	329	21	484	224	226	0	1280
6/27/2021	328	21	477	224	226	0	1280
6/28/2021	328	11	475	224	226	0	1260
6/29/2021	326	0	473	224	226	0	1250
6/30/2021	327	0	467	224	226	0	1240
7/1/2021	327	9	451	224	226	0	1240
7/2/2021	334	7	450	224	226	0	1240
7/3/2021	335	4	445	224	226	0	1230
7/4/2021	329	0	449	224	226	0	1230
7/5/2021	335	13	442	224	226	0	1240
7/6/2021	329	7	435	224	226	0	1220
7/7/2021	331	5	443	224	226	0	1230
7/8/2021	331	0	441	224	226	0	1220
7/9/2021	334	3	438	224	226	0	1230
7/10/2021	335	15	441	224	226	0	1240
7/11/2021	334	7	437	224	226	0	1230
7/12/2021	337	4	435	224	226	0	1230
7/13/2021	336	9	429	224	226	0	1220
7/14/2021	334	12	425	224	226	0	1220
7/15/2021	332	8	413	224	226	0	1200
7/16/2021	326	0	403	224	226	0	1180
7/17/2021	325	7	405	224	226	0	1190
7/18/2021	327	3	402	224	226	0	1180
7/19/2021	327	2	411	224	226	0	1190
7/20/2021	322	6	417	224	226	0	1200
7/21/2021	319	0	417	224	226	0	1190
7/22/2021	316	0	418	224	226	0	1180
7/23/2021	313	4	418	224	226	0	1190
7/24/2021	315	0	424	224	226	0	1190
7/25/2021	316	2	426	224	226	0	1190
7/26/2021	321	0	415	224	226	0	1190

Table 1: Measured Inflows into UKL in Cubic Feet per Second. Note: OWRD gages were located and installed to monitor instream determined claims.

3. Calculating Inflows in Relation to Outflows

13. The total UKL inflow estimate is reconciled against the change in UKL contents and the outflows based on a water balance of the lake performed periodically, expressed as the following equation:

$$\{eqn 2\} \text{ Reconciled UKL Inflows} = \text{Change in UKL Contents} + \text{UKL outflows}$$

Adjustments to the estimated ungaged tributary inflow are made based on this reconciliation to ensure the UKL water balance is satisfied (Table 2) as previously described in section two.

Description of the Variables Used in the Equation:

The **change in UKL contents** is based on contents derived from the USBR elevation capacity table using the average UKL elevation from four USGS lake level gages.

UKL outflows consist of lake evaporation, outflows through the Link River and A - Canal, and 23 other authorized diversions greater than one cfs directly from the UKL. Lake evaporation is currently estimated using weather station data from two nearby AgriMet sites.¹³ Flow through the Link River and A - Canal are measured with gages. The other diversions from the UKL are currently estimated.

Water Balance Summary Table		
Start Date (12:01 am)		6/25/2021
End Date (11:59 pm)		7/26/2021
Number of Days in Reporting Period		32
	AC-FT	<i>Equivalent CFS</i>
Change in Contents (+ = increase)	-51,772	-816
Gaged Inflows	48,940	771
Ungaged Inflows ¹	14,339	226
Groundwater Inflow ²	14,218	224
Precipitation Inflow	0	0
Total Inflow	77,496	1,221
Evaporation	-63,293	-997
Link River Outflow	-58,678	-924
A Canal Diversions	0	0
Adjacent UKL Land Diversions	-7,298	-115
Total Outflow	-129,268	-2,037
UKL Water Balance	0	0
¹ Adjusted to close water balance		
² Updated from Hubbard using Spring Cr&Fall R as hydro-climate index		

Table 2: Water Balance Table in Reconciliation Process.

¹³ The Department estimates evaporation by a Penman-Monteith equation that uses weather data from two USBR AgriMet weather stations just north and south of UKL. Evaporation estimates are adjusted for local lake conditions based on comparisons of the Penman-Monteith derived estimates with concurrent evaporation data on UKL from a study completed by USBR in 2015.

An estimate of lake evaporation between issued Determinations is required to determine the lake water balance, as shown in Table 2. Estimates of daily lake evaporation are also shown in the distribution Table 3 as one component of the daily lake outflows. This daily UKL evaporative estimate from the lake (ac-ft) was modified to be based on the 14-day moving average of the daily rate. The daily rate is based on weather data recorded at two nearby USBR AgriMet sites (KFLO and AGKO).

14. Table 3 represents the Department’s calculations of inflows into UKL versus lake outflows for the time period between June 25, 2021 and July 26, 2021.

DATE	Lake Elevations (FT) and Storage (AC-FT)				Lake Inflows (CFS)	Lake Outflows (CFS)					Flow Distribution Calculation (cfs)						
	UKL Lake Elevation (USBRKB Datum)	UKL Storage	Stored since Jan 1, 2021	KLA 294 Remaining to Store (Max 486,828 AF)	Total Inflows into UKL	Evap	Link River + Keno Canal Flow	A- Canal Diversion	KA 1000 Diversions from Adjacent UKL Lands	Non KA 1000 Diversions from Adjacent UKL Lands	Live Flow Available to Pass Link R Dam	Stored Water Released from Link R Dam	Gaged KA 1000 below LRD	Ungaged KA 1000 below LRD	Non KA 1000 Diversions below LRD	KA 1000 Storage Deliveries blw LRD	Stored Release in Excess of WRS
6/25/2021	4139.89	267,263	182,164	82,047	1280	965	1075	0	11.9	113.1	1155	0	171	0	54	0	0
6/26/2021	4139.87	265,747	182,204	82,008	1280	982	1135	0	11.9	113.1	1155	0	170	0	53	0	0
6/27/2021	4139.85	264,236	182,224	81,988	1280	998	1145	0	11.9	113.1	1155	0	173	0	59	0	0
6/28/2021	4139.83	262,730	182,224	81,988	1260	1025	1145	0	11.9	113.1	1135	10	176	0	68	0	10
6/29/2021	4139.79	259,718	182,224	81,988	1250	1053	1135	0	11.9	113.1	1125	10	166	0	81	0	10
6/30/2021	4139.77	258,212	182,244	81,968	1240	1054	1105	0	11.9	113.1	1115	0	156	0	103	0	0
7/1/2021	4139.74	255,963	182,283	81,928	1240	1047	1095	0	11.9	113.1	1115	0	175	0	124	0	0
7/2/2021	4139.72	254,467	182,283	81,928	1240	1036	1125	0	11.9	113.1	1115	10	194	0	138	0	10
7/3/2021	4139.70	252,971	182,402	81,809	1230	1024	1045	0	11.9	113.1	1105	0	186	0	144	0	0
7/4/2021	4139.67	250,727	182,898	81,313	1230	1022	855	0	11.9	113.1	1105	0	169	0	131	0	0
7/5/2021	4139.65	249,236	183,588	80,623	1240	1022	767	0	11.9	113.1	1115	0	180	0	103	0	0
7/6/2021	4139.63	247,752	184,136	80,076	1220	1026	819	0	11.9	113.1	1095	0	181	0	82	0	0
7/7/2021	4139.60	245,526	184,483	79,728	1230	1032	930	0	11.9	113.1	1105	0	144	0	78	0	0
7/8/2021	4139.57	243,299	184,810	79,401	1220	1044	930	0	11.9	113.1	1095	0	106	0	82	0	0
7/9/2021	4139.55	241,828	185,169	79,042	1220	1042	914	0	11.9	113.1	1095	0	142	0	77	0	0
7/10/2021	4139.53	240,369	185,566	78,645	1240	1046	915	0	11.9	113.1	1115	0	174	0	59	0	0
7/11/2021	4139.51	238,911	185,945	78,267	1230	1034	914	0	11.9	113.1	1105	0	173	0	60	0	0
7/12/2021	4139.49	237,452	186,286	77,925	1230	1024	933	0	11.9	113.1	1105	0	163	0	82	0	0
7/13/2021	4139.45	234,554	186,538	77,673	1220	1009	968	0	11.9	113.1	1095	0	144	0	105	0	0
7/14/2021	4139.43	233,131	186,750	77,461	1220	999	988	0	11.9	113.1	1095	0	152	0	109	0	0
7/15/2021	4139.41	231,709	187,085	77,127	1200	995	935	0	6.3	90.2	1104	0	150	0	102	0	0
7/16/2021	4139.38	229,576	187,437	76,775	1180	985	906	0	6.3	90.2	1084	0	125	0	101	0	0
7/17/2021	4139.35	227,457	187,898	76,313	1190	972	861	0	6.3	90.2	1094	0	115	0	111	0	0
7/18/2021	4139.34	226,759	188,472	75,739	1180	967	794	0	6.3	90.2	1084	0	129	0	112	0	0
7/19/2021	4139.32	225,365	189,013	75,199	1190	957	821	0	6.3	90.2	1094	0	135	0	102	0	0
7/20/2021	4139.30	223,971	189,413	74,799	1190	957	892	0	6.3	90.2	1094	0	120	0	99	0	0
7/21/2021	4139.28	222,577	190,005	74,207	1190	950	795	0	6.3	90.2	1094	0	114	0	90	0	0
7/22/2021	4139.25	220,486	190,579	73,632	1180	946	790	0	11.9	88.9	1079	0	105	0	85	0	0
7/23/2021	4139.23	219,094	191,319	72,892	1180	948	706	0	11.9	88.9	1079	0	100	0	83	0	0
7/24/2021	4139.22	218,398	192,079	72,132	1190	931	706	0	11.9	88.9	1089	0	98	0	74	0	0
7/25/2021	4139.21	217,703	192,843	71,368	1190	919	704	0	11.9	88.9	1089	0	100	0	66	0	0
7/26/2021	4139.20	217,007	193,544	70,668	1190	901	736	0	11.9	88.9	1089	0	100	0	0	0	0

Table 3: Daily Calculations of Inflows Versus Outflows for UKL.

15. Based on the daily calculation of inflows and outflows, storage releases occurred on June 28, June 29, and July 2, 2021. Each of these storage releases was in the amount of ten cfs. (Table 3.)

16. On July 2, 2021, the Department issued a Notice of Violation to the Bureau for the violation that occurred on June 28, 2021. On June 30, 2021 the Bureau came into compliance with the Order.

IV. ULTIMATE FINDINGS OF FACT

1. As of the date of this Determination, water passing through the Link River Dam constitutes natural flow as opposed to water legally stored pursuant to KA 294.
2. On June 29 and July 2, 2021, ten cfs of water was released in excess of permitted purposes by users with existing water rights of record or determined claims to use the stored water in UKL.

V. CONCLUSION

1. On June 29 and July 2, 2021, the Bureau violated the Order.
2. On July 3, 2021, the Bureau came back into compliance with the Order.

VI. NOTICE OF VIOLATIONS

1. The Bureau violated the Order on June 29, 2021 but came back into compliance with the Order on June 30, 2021.
2. The Bureau violated the Order on July 2, 2021 but came back into compliance with the Order on July 3, 2021.

VII. DETERMINATION

During the period of June 25 through July 26 the water passing through the Link River Dam was natural flow with three exceptions. On June 28, June 29, and July 2, 2021, ten cfs of water was released in excess of permitted purposes by users with existing water rights of record or determined claims to use the stored water in UKL. The Department and the Watermaster, District 17, will continue to monitor conditions in the UKL throughout 2021 and will issue a status determination on a monthly basis or as conditions change.

DATED this 28th day of July 2021.



DANETTE WATSON,
Watermaster, District 17
Oregon Water Resources Department

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2021, I served a full, true, and correct copy of the Department's DETERMINATION ON STATUS OF RELEASES OF WATER STORED UNDER DETERMINED CLAIM KA 294 AND NOTICE OF VIOLATIONS

upon the parties hereto as follows:

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- Other: Email

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DATED this 28th day of July, 2021

Nirvana Cook

Nirvana Cook
Oregon Water Resources Department