

**Jennie Bricker  
Land & Water Law**

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Portland, Oregon 97204

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Telephone: 503-928-0976

April 1, 2016

Public Utility Commission of Oregon  
Filing Center  
PO Box 1088  
Salem, OR 97308-1088

**Re: Application for Termination/Abandonment, Mountain Home Water District**

Dear Commissioners:

On behalf of my client, Mountain Home Water District, I have enclosed an APPLICATION TO TERMINATE WATER SERVICE AND ABANDON WATER UTILITY, together with a certificate of filing. The enclosure comprises eight pages, including this cover letter. Please feel free to contact me with questions.

Very truly yours,



Jennie Bricker

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Salem, OR 97308-1088

**Re: APPLICATION TO TERMINATE WATER SERVICE AND ABANDON WATER UTILITY**

The Mountain Home Water District (the "District") makes this Application to Terminate Water Service and Abandon Water Utility (this "Application") pursuant to OAR 860-036-0708(2), requesting an order of the Commission authorizing termination and abandonment.

- (a) Date of this Application: April 1, 2016.
- (b) The name, address, and telephone number of the District:

Legal Name of Water Utility:	<b>Mountain Home Water District (ID #5299)</b>
Name of Water System if Different:	<b>N/A</b>
Name of Owner or Officer:	<b>Keith Ironside</b>
Mailing Address:	<b>2323 SW Buckman Road</b>
City, State, Zip:	<b>West Linn, OR 97068</b>
Location Address if Different:	<b>2351 SW Buckman Road</b>
City, State, Zip:	<b>West Linn, OR 97068</b>
Utility Telephone Number:	<b>503-638-7006</b>
Emergency Phone Number:	<b>503-475-8463</b>
Email Address:	<b>kironside@gmail.com</b>
Website if Available:	<b>N/A</b>

- (c) Statement indicating the action for which the District is seeking Commission approval: The District requests an order of the Commission approving abandonment of the water utility and termination of service to all customers of the District.
- (d) The reasons for abandonment and termination: The well serving the District's customers has failed and cannot be repaired. The well was drilled in 1972 to a depth of 600 feet. The original drillers installed 90 feet of casing, leaving the well open from 90 to 600 feet. In the summer of 2015, the system experienced a loss of water pressure, possibly the result of interference from a new well or wells in the vicinity. Steve's Pump Service, the company who performs regular maintenance, recommended the District lower the pump from a depth of 397 feet to a new depth of 405 feet. The District hired Olsen Well Drilling to perform the work. In March 2016, Olsen attempted to lower the pump but found that the well had caved in at a depth of 380 feet. The District asked Olsen to clear the cave-in and to install additional 6-inch steel casing that would prevent future cave-ins. However, the original well had been drilled at an angle and proved too crooked to permit casing installation. Olsen attempted to re-drill the existing well but could not straighten it sufficiently to install casing. Vance Wagner, Olsen's project manager, recommended that the well be abandoned.
- (e) The proposed effective date: June 30, 2016. The shared well is no longer operational. District customers are currently being provided with water service from a smaller, private well located on the owner's property. That source of supply is not viable to continue water service in the long term; however, provided it remains operational in the short term, the District proposes to terminate service on June 30, 2016, which is at least 90 days from the date all customers received notice of this Application.
- (f) Alternative water service options and estimated costs: The District serves four customers in addition to the owner. Each customer's property is large enough (more than one acre) to make construction of a separate well feasible. Olsen Well Drilling estimates the cost of drilling a new well in this vicinity at approximately \$30,000, assuming a probable depth of

500 feet and a flow of approximately 20 gallons per minute, which would be sufficient for a single-user well or a shared well with two users, if their water needs were moderate.

The customers have many alternative options, including drilling one or more shared wells, or arranging water delivery from an existing well on adjacent property. The cost of each alternative is not possible to estimate.

(g) The contact information (and service address) for each affected customer:

Don Rushmer  
2395 SW Buckman Road  
West Linn, OR 97068

Elizabeth Kelley  
2385 SW Buckman Road  
West Linn, OR 97068

Mel Kroker  
2333 SW Turner Road  
West Linn, OR 97068

Robert Wiest  
2375 SW Buckman Road  
West Linn, OR 97068

- (h) Other pertinent information: The owner held a meeting with customers of the District on the evening of March 28, 2016. The purpose of the meeting was to inform all customers about the well failure, the termination of service, and this Application. At the meeting, each customer received a Notice of Abandonment/Termination of Service, with the exception of Robert Wiest, who was unable to attend. Mr. Wiest received the notice on March 29, 2016. A copy of the notice is attached to this Application as Exhibit A.

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Wherefore the District respectfully requests that the Commission enter an appropriate order authorizing the transaction proposed herein.

MOUNTAIN HOME WATER DISTRICT

Date: April 1, 2016


          /s/ (see attached sheet)            
Keith Ironside, Owner

State of Oregon                                     ) ss.  
  )  
County of \_\_\_\_\_                             )

\_\_\_\_\_,  
(Name of Party signing above) being first duly sworn, deposes and says he is Owner of Mountain Home Water District, the applicant in the foregoing application, that he has read said application, including all exhibits thereto, knows the contents thereof, and the same are true to the best of his knowledge and belief.

(Signature) \_\_\_\_\_

(Notarial Seal)

  
\_\_\_\_\_

Jennie L. Bricker, OSB No. 975240  
Attorney for Mountain Home Water District

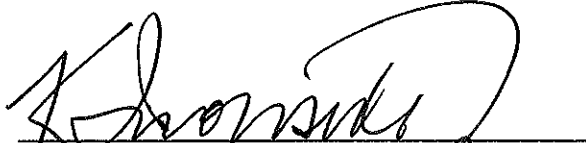
Direct Telephone: 503-928-0976  
E-Mail: [jennie@jbrickerlaw.com](mailto:jennie@jbrickerlaw.com)  
818 SW Third Avenue, PMB 1517  
Portland, OR 97204

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Wherefore the District respectfully requests that the Commission enter an appropriate order authorizing the transaction proposed herein.

MOUNTAIN HOME WATER DISTRICT

Date: April 1, 2016

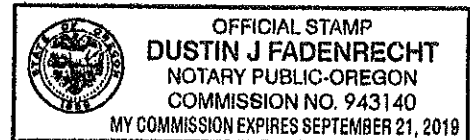
  
\_\_\_\_\_  
Keith Ironside, Owner

State of Oregon ) ss.  
County of Washington )

Keith Ironside,  
(Name of Party signing above) being first duly sworn, deposes and says he is Owner of Mountain Home Water District, the applicant in the foregoing application, that he has read said application, including all exhibits thereto, knows the contents thereof, and the same are true to the best of his knowledge and belief.

(Signature) Dustin Fadenrecht

(Notarial Seal)



\_\_\_\_\_  
Jennie L. Bricker, OSB No. 975240  
Attorney for Mountain Home Water District

**Exhibit A**

**NOTICE OF ABANDONMENT/TERMINATION OF SERVICE**

OAR 860-036-0708

**April 1, 2016**

**Mountain Home Water District  
2323 SW Buckman Road  
West Linn, OR 97068**

**I.D. No. 5299 (PWS I.D. #4105507)  
2351 SW Buckman Road  
West Linn, OR 97068**

**503-638-7006  
503-475-8463**

**kironside@gmail.com**

The purpose of this notice is to inform our customers that we filed an application with the Public Utility Commission of Oregon (Commission) on April 1, 2016, to abandon the water system and terminate the provision of water service to you.

We filed for an effective date of June 30, 2016; however, this transaction must be approved by the Public Utility Commission of Oregon (PUC). We are pursuing this transaction because the shared well serving the water system has failed and cannot be repaired.

We believe there are alternative water sources available to you, such as drilling a well on your own property or entering into a well-sharing agreement with another property owner.

For further information regarding our application, you may contact us using the information provided above.

You may file comments or ask questions by contacting the Commission's Consumer Services Section at 503-378-6600; 1-800-522-2404; TTY 711, or [puc.consumer@state.or.us](mailto:puc.consumer@state.or.us). You can also mail comments/questions or visit their office at the addresses below.

**Street Address**

Public Utility Commission of Oregon  
Consumer Services Section  
3930 Fairview Industrial Dr SE  
Salem, Oregon 97302

**Mailing Address**

Public Utility Commission of Oregon  
Consumer Services Section  
PO Box 1088  
Salem OR 97308-1088

**CERTIFICATE OF FILING**

I certify that on April 1, 2016, I filed the foregoing **APPLICATION TO TERMINATE WATER SERVICE AND ABANDON WATER UTILITY** by electronic mail with the Public Utility Commission's Filing Center at [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us), with an electronic mail copy to Celeste Hari at [celeste.hari@state.or.us](mailto:celeste.hari@state.or.us).

DATED: April 1, 2016



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JENNIE L. BRICKER

OSB No. 975240

E-Mail: [jennie@jbrickerlaw.com](mailto:jennie@jbrickerlaw.com)

Attorney for Mountain Home Water District