

JAKE MCGRADY  
ADMITTED TO PRACTICE LAW IN IDAHO  
EMAIL: jmcgrady@hawleytroxell.com  
DIRECT DIAL: 208.388.4958  
DIRECT FAX: 208.954.5296

August 22, 2011

**VIA U.S. MAIL**  
**VIA E-MAIL**

Idaho Department of Water Resources  
Attn: Interim Director Gary Spackman  
P.O. Box 83720  
Boise, Idaho 83720-0098

Re: CM-DC-2011-002 (Jones Delivery Call for Water Right No. 36-07071)

Dear Mr. Spackman,

Pursuant to the agreement reached at the August 8, 2011, scheduling conference, whereby each party to the litigation will be provided the same information from the Department, the Jones request a copy of the information produced at the behest of the Idaho Ground Water Appropriators, Inc., on August 18, 2011, including:

- All data sets, model files and related documents generated or used in the analysis of the Jones delivery call described in the Director's Order of July 29, 2005, denying the Jones delivery call.
- All data sets, model files and related documents generated or used in any analysis of the 2011 Jones' delivery call, Weatherby Springs, Three Springs, and Hoagland Tunnel or the Thousands Springs to Malad reach of the Snake River.
- All historical records of measured water flows in the Jones' facility, including discharges, diversions and bypasses at each spring outlet for which the Jones facility has a water right.
- All correspondence between the Department and owners/operators of the Jones' facility, John W. Jones and Deloris D. Jones.

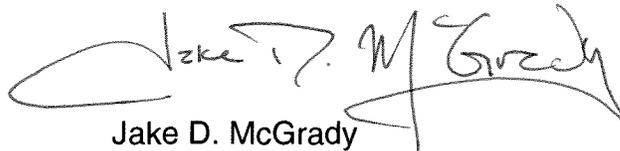
- All records and documents associated with any wells, well pumps, groundwater production, and groundwater quality located within one mile of the spring source for water right no. 36-07071.
- All documents and records associated with geologic, hydrologic and hydrogeologic investigations within two miles of the spring source for water right no. 36-07071.

Please also provide the same verification that the water right files available online for water right no. 36-07071 are complete and contain all permits, licenses and decrees relative to the water right at issue, including all related documentation and field inspection and verification reports made by the Department. If the online water right files are not complete, please provide the same information on where the complete files may be found and when they can be inspected and copied.

We appreciate your attention to this matter, and please do not hesitate to call with any questions.

Sincerely,

HAWLEY TROXELL ENNIS & HAWLEY LLP



Jake D. McGrady

cc: Candice McHugh