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May 14, 2012

**VIA EMAIL AND U.S. MAIL**

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

Re: CM-DC-2011-004 Rangen Delivery Call for Water Right Nos. 36-2551 & 36-7694

Dear Mr. Spackman:

The following information is requested from the Department and Department staff on behalf of the Idaho Ground Water Appropriators, Inc. regarding the above-mentioned matter. IGWA is requesting that copies of this information be made available or that the information be made available for inspection at the Department as soon as practical.

- All correspondence, information, emails and documents between Rangen and the Department.
- All correspondence and information regarding Rangen's prior delivery calls. IGWA's information shows that the first such delivery call or correspondence regarding Rangen's demand for water was in the summer of 2003.
- All data sets, model files and related documents generated or used in the analysis of the prior Rangen delivery calls.
- All data sets, model files and related documents generated or used in any analysis of the 2011 Rangen delivery call that have not already been produced.

- All historical records of measured water flows in the Rangen facility, including discharges, diversions and bypasses at each spring outlet for which the Rangen facility has water rights.
- All records and documents associated with any wells (including but not limited to well design and construction), well logs, well pumps, groundwater production, and groundwater quality located within one mile of the spring source for water right nos. 36-00134B, 36-00135A 36-15501, 36-2551 and 36-7694.
- All documents and records associated with geologic, hydrologic and hydrogeologic investigations within two miles of the spring source for water right nos. 36-00134B, 36-00135A 36-15501, 36-2551 and 36-7694 that the Department may have in its files, including those in storage.
- All documents, records, affidavits, briefs, photographs, newspaper articles pertaining to the Martin-Curran Tunnel (also known as "Kearn" Spring, Curran Spring or Curran Tunnel) that the Department may have in its files, including those in storage.
- All documents, records and descriptive information pertaining to the history, development and work performed on the Martin-Curran Tunnel.
- All documents that were part of the case titled, *New International Mortgage Bank vs. Idaho Power Co.*, Equity No. 1602 (1932) filed in the Federal District Court for Southern Idaho, that the Department may have in its files, including those in storage.

We would also like you to verify that the water right files available online for water right nos. 36-00134B, 36-00135A 36-15501, 36-2551 and 36-7694 are complete and contain all permits, licenses and decrees relative to the water rights 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 information on where the complete files are and when they can be inspected and copied.

We appreciate your prompt attention to this matter and please let us know if you have any questions.

Very Truly Yours,



Candice McHugh

ccs: J. Justin May  
Robyn Brody  
Fritz Haemmerle  
Cindy Yenter, IDWR Southern Region