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DEPARTMENT OF  
WATER RESOURCES

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Attorneys for State Agency Ground Water  
Users

**BEFORE THE DIRECTOR  
OF THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO**

IN THE MATTER OF DISTRIBUTION OF  
WATER TO VARIOUS WATER RIGHTS  
HELD BY OR FOR THE BENEFIT OF A & B  
IRRIGATION DISTRICT, AMERICAN FALLS  
RESERVOIR DISTRICT #2, BURLEY  
IRRIGATION DISTRICT, MILNER  
IRRIGATION DISTRICT, MINIDOKA  
IRRIGATION DISTRICT, NORTH SIDE  
CANAL COMPANY, and TWIN FALLS  
CANAL COMPANY

**IGWA's, POCATELLO'S AND STATE  
AGENCY GROUND WATER USERS' JOINT  
WRITTEN REQUEST TO DEPOSE IDAHO  
DEPARTMENT OF WATER RESOURCES  
EMPLOYEES**

Pursuant to the *Scheduling Order* issued by the Department on July 22, 2005 (“Scheduling Order”), Idaho Ground Water Appropriators, Inc (“IGWA”), the City of Pocatello (“Pocatello”), and the State Agency Ground Water Users, jointly submit this request to depose Idaho Department of Water Resources (“Department”) employees. Paragraph 2(a) of the Scheduling Order provides that “Department employees will be available for deposition upon written request.”

The Parties request that the following Department employees (including certain Department contractors) be made available for depositions in Boise, at the State Office of the Idaho Department of Water Resources, or at the offices of Mr. Ron Carlson in Idaho Falls, beginning during the week of August 29, 2005, or as soon thereafter as practicable, given employees’ and contractors’ schedules:

Ron Carlson, Water Master, Water District 01

Tim Luke, Water Distribution Section Manager

Allan Wylie, Technical

Michael Ciscell, Adjudication

David R. Tuthill, Jr., Administrator, Water Management Division

Dr. Donna Cosgrove, University of Idaho, Idaho Falls Campus, Idaho Water Resources Research Institute, Hydrogeology/Modeling.

Bryce Contor, University of Idaho, Idaho Falls Campus, Idaho Water Resources Research Institute, Hydrogeology/Modeling.

Any responsible Department representative(s) who can answer questions about the facts underlying any orders issued in this case, and materials that have been and/or will be officially noticed in this proceeding. (IDAPA 37.01.01.602 and Idaho Code 67-5251.)

The foregoing notwithstanding, the above parties recognize that the Director, as the decision maker in this matter, should not be deposed, and therefore do not seek his deposition.

If these depositions cannot be completed during the week of August 29, then it is requested that they be completed later at mutually acceptable times.

The above Parties reserve the right to request additional depositions of Department employees (including Department contractors) as discovery progresses and will file additional requests with the Department if additional depositions are necessary. The above Parties submitting this Joint Written Request anticipate that all parties to this proceeding, including those not signatories to this pleading, will participate in the depositions.

Dated this 23<sup>rd</sup> day of August 2005.

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Deputy Attorney General, State of Idaho  
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## CERTIFICATE OF SERVICE

I hereby certify that on this 23<sup>rd</sup> day of August 2005, I served a true and correct copy of the foregoing by delivering it to the following individuals by the method indicated below, addressed as stated.

Mr. Karl J. Dreher	<u>          </u>	U.S. Mail
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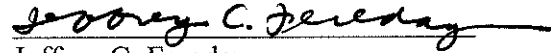
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