

BEFORE 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)	Docket No. CM-DC-2010-001
THE BENEFIT OF A&B IRRIGATION DISTRICT,)	
AMERICAN FALLS RESERVOIR DISTRICT #2,)	FINAL ORDER REGARDING
BURLEY IRRIGATION DISTRICT, MILNER)	APRIL 2010 FORECAST
IRRIGATION DISTRICT, MINIDOKA IRRIGATION)	SUPPLY (Methodology Steps
DISTRICT, NORTH SIDE CANAL COMPANY,)	3 & 4); ORDER ON
AND TWIN FALLS CANAL COMPANY)	RECONSIDERATION
_____)	

FINDINGS OF FACT

1. On April 7, 2010, the Director of the Idaho Department of Water Resources (“Director” or “Department”) issued his *Final Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover* (“April 7 Methodology Order”). The Methodology Order established ten steps for determining material injury to members of the Surface Water Coalition (“SWC”). On April 29, 2010, the Director issued his *Order Regarding April 2010 Forecast Supply (Methodology Steps 3 & 4)* (“April 29 Forecast Supply Order”). Based on predictions for natural flow and storage supplies, the Director determined that American Falls Reservoir District No. 2 (“AFRD2”) and Twin Falls Canal Company (“TFCC”) would suffer material injury during the 2010 irrigation season.

2. On June 16, 2010 the Director issued an *Amended Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover* (“June 16 Amended Methodology Order”).

3. On June 23, 2010, the Director issued a *Second Amended Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover* (“June 23 Second Amended Methodology Order”).

4. This order will explain the application of steps 3 and 4 for both the original April 7 Methodology Order and the June 23 Second Amended Methodology Order. The June 23 Second Amended Methodology Order amended step 4 to allow the Director to adjust the prediction of demand shortfall at the time the final April forecast supply order is issued.

I. April 7 Methodology Order and April 29 Forecast Supply Order

5. The April 7 Methodology Order described processes for predicting the water supply for an upcoming irrigation season, determining any demand shortfall for the SWC, and determining the ground water users' mitigation obligation for the shortfall. The April 29 Forecast Supply Order applied the processes to the facts for the 2010 irrigation season.

A. Step 3

6. Step 3 states that, within fourteen days of the issuance of the joint forecast ("Joint Forecast") prepared by the United States Bureau of Reclamation and the United States Army Corps of Engineers, the Director shall "issue a Forecast Supply for the water year and will compare the forecast supply to the baseline demand ("BD") to determine if a demand shortfall ("DS") is anticipated for the upcoming irrigation season. A separate Forecast Supply and DS will be determined for each member of the SWC." *April 7 Methodology Order* at 34 and *June 23 Second Amended Methodology Order* at 37.

7. On April 8, 2010, the Joint Forecast was announced predicting an unregulated inflow of 1,940,000 acre-feet.

8. Based upon the Joint Forecast, in the April 29 Forecast Supply Order the Director predicted the following:

	Predicted Natural Flow Supply	Predicted Storage Allocation	Total Supply	BLY 2006/2008	Shortfall
A&B	0	135,371	135,371	58,492	0
AFRD2	1,256	387,102	388,358	415,730	27,400 ¹
BID	65,123	222,507	287,630	250,977	0
Milner	0	89,107	89,107	46,332	0
Minidoka	94,486	358,438	452,924	362,884	0
NSCC	233,145	843,169	1,076,314	965,536	0
TFCC	747,391	241,078	988,469	1,045,382	56,900
				Total	84,300

¹ In its *Corrected Petition for Reconsideration of Final Order Regarding Methodology Dated April 7, 2010*, the Idaho Ground Water Appropriators, Inc. ("IGWA") raised concerns regarding natural flow diversions by AFRD2 and the interim director's initial determination of material injury. IGWA did not explain why the interim director's determination of shortfall for AFRD2 was incorrect. The interim director reviewed the method of determining the shortfall, AFRD2's water rights, and the accounting of water deliveries to AFRD2. The interim director did not find compelling information to change the initial prediction of shortfall for AFRD2.

B. Step 4

9. The April 7 Methodology Order described Step 4 as follows:

If the April DS is greater than the reasonable carryover shortfall from the previous year, junior ground water users will be required to establish, to the satisfaction of the Director, their ability to secure and provide a volume of storage water equal to the difference of the April projected demand shortfall and reasonable carryover shortfall, for all injured members of the SWC. If junior ground water users cannot provide this information, by May 1, or within fourteen (14) days from issuance of the values set forth in Step 3, whichever is later in time, the Director will issue an order curtailing junior ground water users.

*April 7 Methodology Order at 34.*²

10. According to the April 29 Forecast Supply Order:

[I]f junior ground water users provide no water for purposes of mitigation, the Director shall issue an order curtailing ground water rights junior to April 5, 1982. The curtailment shall affect 73,782 acres within the area of common ground water supply in Water District Nos. 34, 110, 120, 130, and 140, and will increase reach gains by 77,985 acre-feet. If junior ground water users secure a volume of water less than 84,300 acre-feet, the Director will redetermine the extent of curtailment, as simulated by the ESPA Model. Curtailment shall apply to consumptive ground water rights for agricultural, commercial, industrial, and municipal uses, excluding ground water rights used for *de minimis* domestic purposes where such domestic use is within the limits of the definition set forth in Idaho Code § 42-111 and ground water rights used for *de minimis* stock watering where such stock watering use is within the limits of the definitions set forth in Idaho Code § 42-1401A(12), pursuant to IDAPA 37.03.11.020.11.

April 29 Forecast Supply Order at 4.

11. The April 29 Forecast Supply Order notified the parties of the option to file petitions for reconsideration and/or request a hearing.

² Steps 9 and 10 of the Methodology Order require the Director to predict reasonable carryover shortfalls to reservoir space held by member of the SWC in the fall before the subsequent irrigation season. June 23 Second Amended Methodology Order at 40. Given when the June 23 Second Amended Methodology Order was issued, junior ground water users were not under an obligation in the fall of 2009 to provide reasonable carryover shortfalls. At this time, it is forecasted that reservoir space held by members of the SWC will fill in 2010. In the fall of 2010, the Director will determine reasonable carryover shortfalls, if any, for members of the SWC. At that time, junior ground water users will be expected to comply with Steps 9 and 10, in whole or in part, or face curtailment, in whole or in part. *See id.* at 40.

12. On May 6, 2010, the Idaho Ground Water Appropriators, Inc. (“IGWA”) filed a petition for reconsideration of the April 29 Forecast Supply Order and requested a hearing. The City of Pocatello (“Pocatello”) joined in IGWA’s request (IGWA and Pocatello may be collectively referred to herein as “Ground Water Users”). The SWC also requested a hearing. IGWA’s petition for reconsideration was granted and a hearing was scheduled to commence immediately following the May 24, 2010 hearing on the April 7 Methodology Order. *Order Denying IGWA’s Request for Stay and/or Extension of Time; Order Granting Request for Reconsideration and Hearing; Order Authorizing Discovery, in Part; and Notice of Hearing* (May 10, 2010). Because the requests for hearing were filed with the petitions for reconsideration, all issues raised in the petitions for reconsideration should have been raised and addressed during the hearing, unless the Director had disposed of issues prior to the hearing.

13. On May 13, 2010, citing Idaho Code § 42-1701(A)(2), Pocatello moved the Director to appoint an independent hearing officer to preside at the hearing on the use of 2008 data. On May 18, 2010, the Director denied Pocatello’s request: “The Director is best positioned to preside in these hearings. Appointment of an independent hearing officer would only serve to delay these proceedings and ultimately delay administration of hydraulically connected surface and ground water rights during the 2010 irrigation season.” *Order Denying Request for Independent Hearing Officer* at 1.

14. IGWA’s petition for reconsideration requested that the Director reconsider his determination that IGWA must provide 84,300 acre-feet, as opposed to 77,985 acre-feet that would result from curtailment within the area of common ground water supply. *Affidavit of Charles Brendecke* at 3. *See also* IDAPA 37.03.11.050.01 (“CM Rule 50.01”).

15. The April 29 Forecast Supply Order required that, by May 13, 2010, IGWA “must establish, to the satisfaction of the Director,” that IGWA had secured the amount of water to mitigate for material injury. *April 29 Forecast Supply Order* at 3.

16. On May 13, 2010, IGWA filed its *Notice of Water Secured and Renewed Request for Stay* (“notice”). The notice stated that IGWA has “secured a total of 68,000 acre-feet of water[]” to pledge towards its total mitigation obligation of approximately 109,300 acre-feet. *Notice* at 2. The total mitigation obligation includes mitigation for Clear Springs Foods, Inc. and the SWC. The notice did not state how much of IGWA’s secured water was pledged to the SWC delivery call. Nor did the notice include contracts, agreements, or options for the Director to evaluate the secured water. The notice also sought a stay in order to conclude proceedings on IGWA’s mitigation plan for the SWC, which was scheduled for hearing during the last week of May, 2010.

17. On May 14, 2010, the Director informed IGWA that it would have until the end of the May 14th business day to provide the requested information. *Order Regarding Filing Deficiency of IGWA’s Notice of Secured Water*.

18. On May 14, 2010, IGWA filed a *Supplement to Notice of Secured Water* (“supplement”). The supplement stated that IGWA had secured 68,000 acre-feet of water, of which “a minimum of 53,000 acre-feet . . . is pledged to the SWC delivery call.” *Supplement* at 1. Attached to the supplement are copies of executed agreements between IGWA and other entities to provide IGWA with storage water.

II. May 17 Order Regarding IGWA Mitigation Obligation

19. Following issuance of the April 29 Forecast Supply Order, members of the SWC diverted water for beneficial use. Precipitation in the Upper Snake River Basin during the month of April was 140% of average. Idaho Water Supply Outlook Report May 1, 2010.

20. On May 17, 2010, the Director issued an interlocutory order titled *Order Regarding IGWA Mitigation Obligation* ("May 17 Mitigation Obligation Order").

21. In the April 29 Forecast Supply Order, the Director predicted that AFRD2 would receive 1,256 acre-feet in natural flow,³ and would have a demand shortfall of 27,400 acre-feet. Due to the cool and wet spring, AFRD2 diverted natural flow in excess of the Director's prediction in the April 29 Forecast Supply Order. Water District 01's preliminary accounting for May 17, 2010 shows that AFRD2 had diverted 16,874 acre-feet of natural flow.

22. The Director determined with certainty that AFRD2 diverted more natural flow than it was predicted to receive during the 2010 irrigation season.

23. Based upon AFRD2's actual natural flow diversions, the May 17 Mitigation Obligation Order predicted the following demand shortfalls for the 2010 irrigation season:

	Predicted Natural Flow Supply ⁴	Predicted Storage Allocation	Total Supply	BLY 2006/2008	Shortfall
A&B	0	135,371	135,371	58,492	0
AFRD2	16,874	387,102	403,976	415,730	11,800
BID	65,123	222,507	287,630	250,977	0
Milner	924	89,107	90,031	46,332	0
Minidoka	94,486	358,438	452,924	362,884	0
NSCC	243,403	843,169	1,086,572	965,536	0
TFCC	747,672	241,078	988,750	1,045,382	56,600 ⁵
				Total	68,400

³ Slight data errors in the Department's regression analysis for AFRD2 were found in the April 29 Forecast Supply Order and have been corrected. Based upon the corrected regression, the Director would have predicted a natural flow supply of 513 acre-feet in the April 29 Forecast Supply Order.

⁴ Similarly with AFRD2, slight data errors in the Department's regression analysis in the April Forecast Supply Order for A&B, Milner, NSCC, and TFCC. The corrected values are shown in the table and the regressions attached hereto. The regressions for BID and MID were correct in the April Forecast Supply Order. The Department will attach BID and MID's regressions for purposes of convenience. All regressions are attached hereto as Attachment A.

⁵ Based on the corrected regression, TFCC's predicted shortfall is 56,600 acre-feet, not 56,900 acre-feet.

24. Using the ESPA Model, curtailment of ground water rights junior to June 28, 1983 would increase gains between the Near Blackfoot and Minidoka gages by 68,426 acre-feet. Curtailment of ground water rights located only within the area of common ground water supply, CM Rule 50.01, is simulated to increase gains between the Near Blackfoot and Minidoka gages by 62,232 acre-feet. The ESPA Model simulation established a mitigation obligation for junior ground water users of 62,232 acre-feet.

III. Hearing on the April 29 Forecast Supply Order

25. On May 21, 2010, the Director informed the parties that Elizabeth Cresto, Mathew Weaver, and Allan Wylie would be made available to testify at hearing regarding the April 29 Forecast Supply Order. *Order Limiting Scope of Evidence and Offering Witnesses* at 2.

26. On May 21, 2010, the United States Bureau of Reclamation informed the Director and the parties that it would not participate in the May 24, 2010 hearing on the April 29 Forecast Supply Order. *Reclamation's Notice Regarding the Hearing on the Use of 2008 Data and Methodology Steps 3 and 4*.

27. On May 24, 2010, hearing commenced before the Director on the April 29 Forecast Supply Order. Ms. Cresto and Mr. Weaver were called by Deputy Attorney General Chris M. Bromley to explain the Director's application of Steps 3 and 4. Ms. Cresto and Mr. Weaver were cross-examined by attorneys for the Ground Water Users and the SWC. Gregory K. Sullivan was called by Pocatello. Dr. Charles M. Bredecke was called by IGWA. Timothy P. Deeg, IGWA Chairman, was called by IGWA.

28. The April 7 Methodology Order explained the process by which the Director would use the Joint Forecast, together with regression equations for each SWC entity, to predict natural flow at the start of the irrigation season. *April 7 Methodology Order* at 10, ¶ 22; 20, ¶ 58. The April 7 Methodology Order was less specific on the method by which the Department would predict storage. *Id.* at 20, ¶ 59.

29. At hearing, Ms. Cresto testified that she is the Department employee responsible for predicting natural flow and storage allocation. Ms. Cresto explained the process the Department used this season for predicting reservoir fill and storage allocation is the same method the Department has used previously. Exhibit 1007 (*Fifth Supplemental Order Amending Replacement Water Requirements Final 2006 & Estimated 2007* ("Fifth Supplemental Order")). Ms. Cresto explained that the process described in Exhibit 2000 (Departmental memo) is consistent with the Fifth Supplemental Order and her understanding of how the Department predicts reservoir fill and storage allocation. The June 23 Second Amended Methodology Order describes the process for predicting storage fill and storage allocation in greater detail.

30. At the hearing, IGWA presented evidence that it had acquired or had options to acquire 77,000 acre feet of storage water. No additional storage water beyond the 53,000 previously offered was dedicated to satisfy IGWA's mitigation obligation.

IV. June 3 Order Approving IGWA's Mitigation Plan

31. On June 3, 2010, the Director issued his *Order Approving Mitigation Plan* offered by IGWA. The order recognized that storage water rented by IGWA as a source of mitigation water in responding to the SWC delivery call. The order also required that IGWA provide to the Director the following documentation of acquisition and dedication of the storage water:

IGWA must provide proof of rental or an option to rent storage water and of a commitment of the storage water to the SWC within the deadlines provided by the Methodology Order and any order of the Director implementing the Methodology Order for a given year. Proof of rental or an option to rent storage water shall consist of fully executed and irrevocable contracts with holders of Snake River storage (fully disclosed in the contracts). Storage shall be committed to the SWC by IGWA submitting the storage rental or storage option contracts to the Upper Snake River Rental Pool and the Director with a written instruction to the Watermaster of Water District 01 that the underlying storage water is committed solely for mitigation to the SWC and that the contracts or options may only be released back to IGWA or the storage water lessors by directive to the Watermaster by the Director of the Department.

Order Approving Mitigation Plan at 10.

V. June 23 Second Amended Methodology Order and this June 24 Forecast Supply Order

32. Following completion of the hearing for the April 29 Forecast Supply Order, the wet and cool weather patterns continued through the end of May and the first week of June. Precipitation in the Upper Snake River Basin during the month of May was 119% percent of average, Idaho Water Supply Outlook Report May 1, 2010 and June 1, 2010. The National Oceanic and Atmospheric Administration reported that Idaho experienced the second coolest May on record. NOAA: Near-Normal U.S. Temperatures and Above-Normal U.S. Precipitation in May, June 8, 2010. The cool, wet weather pattern has continued into June, further delaying irrigation demands.

33. On June 4, 2010, IGWA supplemented the lease summaries presented at hearing, adding another 5,000 acre-feet, for a total of 82,000 acre-feet leased for 2010.

34. On June 16, 2010 the Director issued an *Amended Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover*. On June 23, 2010 the Director issued a *Second Amended Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover* (June 23 Second Amended Methodology Order”). The June 23 Second Amended Methodology Order contained the following language describing Step 4:

Step 4: If the April DS is greater than the reasonable carryover shortfall from the previous year, junior ground water users will be required to establish, to the satisfaction of the Director, their ability to secure and provide a volume of storage water or to conduct other approved mitigation activities that will provide water to the injured members of the SWC equal to the difference of the April projected demand shortfall and reasonable carryover shortfall, for all injured members of the SWC. If junior ground water users fail or refuse to provide this information by May 1, or within fourteen (14) days from issuance of the values set forth in Step 3, whichever is later in time, the Director will issue an order curtailing junior ground water users.⁶ Modeled curtailment shall be consistent with previous Department efforts. The ESPA Model will be run to determine the priority date necessary to produce the necessary volume within the model boundary of the ESPA. However, because the Director can only curtail junior ground water rights within the area of common ground water supply, CM Rule 50.01, junior ground water users will be required to meet the volumetric obligation within the area of common ground water supply, not the full model boundary.

If, at any time prior to the Director’s final determination of the April Forecast Supply, the Director can determine with certainty that any member of the SWC has diverted more natural flow than predicted, or has accrued more storage than predicted, the Director will revise his initial, projected demand shortfall determination.

June 23 Second Amended Methodology Order at 38-39.

35. Water District 01’s preliminary accounting for June 10, 2010 shows that AFRD2 had diverted 32,381 acre-feet of natural acre-feet of natural flow.

36. AFRD2 has diverted 32,381 acre-feet of natural flow from the Snake River during 2010. The water volume of 32,381 acre-feet exceeds the natural flow demand shortfall predicted for AFRD2 for the 2010 irrigation season. As a result, the Director should adjust the deficiency shortfall for AFRD2 and the total deficiency shortfall.

⁶ This presumes that any reasonable carryover obligation has been met, and that junior ground water users are not already under prior curtailment from deficiencies in meeting the previous year’s obligation.

37. The Director determined with certainty that AFRD2 diverted more natural flow than the natural flow needed for a full supply for the 2010 irrigation season. Because AFRD2 diverted more water than it needed, the following is a revised table showing that AFRD2's demand shortfall for 2010 is zero.

	Predicted Natural Flow Supply	Predicted Storage Allocation	Total Supply	BLY 2006/2008	Shortfall
A&B	0	135,371	135,371	58,492	0
AFRD2	32,380	387,102	403,976	415,730	0
BID	65,123	222,507	287,630	250,977	0
Milner	924	89,107	90,031	46,332	0
Minidoka	94,486	358,438	452,924	362,884	0
NSCC	243,403	843,169	1,086,572	965,536	0
TFCC	747,672	241,078	988,750	1,045,382	56,600
				Total	56,600

38. Junior ground water users must establish, to the satisfaction of the Director, their ability to secure 56,600 acre-feet. The Director will review the executed storage water leases and options to lease storage water and combine sufficient leases together to provide the 56,600 acre-feet obligation. These leases should be committed to the Watermaster of Water District 01 by instruction of the Director solely for the SWC mitigation.

39. The water required to mitigate material injury shall be owed at the Time of Need, as established in Step 8 of the Methodology Order. At the Time of Need, the volume of water necessary to mitigate material injury to members of the SWC may be less but not greater than 56,600 acre-feet. *June 23 Second Amended Methodology Order* at 40.

CONCLUSIONS OF LAW

1. Based upon the Joint Forecast, the Director predicts, at this time, a demand shortfall will occur to TFCC's Reasonable In-Season Demand ("RISD"); thereby resulting in material injury. IDAPA, 37.03.11.042. At this time, the predicted material injury is to TFCC 56,600 acre-feet. At this time, no other members of the SWC are predicted to suffer material injury during the 2010 irrigation season. The total predicted material injury to RISD for members of the SWC in the 2010 irrigation season shall be no greater than 56,600 acre-feet.

2. The predicted volume of water required to mitigate material injury shall be owed at the Time of Need, as established in Step 8 of the Methodology Order. The volume of water necessary to mitigate material injury at the Time of Need may be less, but not greater than 56,600 acre-feet.

3. All issues raised by the petitions for reconsideration and at the hearing if not expressly addressed by this order will be denied.

ORDER

Based upon and consistent with the foregoing, IT IS HEREBY ORDERED as follows:

The Director predicts, at this time, a demand shortfall of 56,600 acre-feet to TFCC's reasonable in-season demand. At this time, no other members of the SWC are predicted to experience material injury during the 2010 irrigation season. The maximum, combined demand shortfall for members of the SWC during the 2010 irrigation season is 56,600 acre-feet.

IT IS FURTHER ORDERED that junior ground water users are not required to provide the secured volume of mitigation water until after the Director determines the SWC's Time of Need, as established in Step 8 of the Methodology Order. The volume of water required for mitigation at the Time of Need may be more or less for individual SWC members, but the combined volume will not be greater than 56,600 acre-feet.

IT IS FURTHER ORDERED that the following leases and contracts for lease of storage water shall be dedicated solely for mitigation to the SWC until further determined by the Director:

<i>Water Storage Lessor Entity</i>	<i>Storage Volume Obtained (acre-feet)</i>
Enterprise Canal Company	10,000
Idaho Irrigation District	10,000
Snake River Valley Irrigation District	10,000
Peoples Canal & Irrigation Company	7,000
Mitigation, Inc.	5,000
New Sweden Irrigation District	5,000
Palisades Water Users & City of Idaho Falls	5,000
Progressive Irrigation District	5,000
Total	57,000 acre-feet

IT IS FURTHER ORDERED that the Watermaster of Water District 01 shall not deliver water rented under the above contracts to any other entity other than the SWC, including the lessor, until further notice by the Director.

IT IS FURTHER ORDERED that all issues raised by the petitions for reconsideration and at the hearing if not expressly addressed by this order are **Denied**.

IT IS FURTHER ORDERED that this amended Final Order supersedes the Final Order issued April 29, 2010.

IT IS FURTHER ORDERED that pursuant to sections 67-5270 and 67-5272, Idaho Code, any party aggrieved by the final order or orders previously issued by the Director in this matter may appeal the final order and all previously issued orders in the matter to district court by filing a petition in the district court of the county in which a hearing was held, the final agency action was taken, the party seeking review of the order resides, or the real property or personal property that was the subject of the agency action is located. The appeal must be filed within twenty-eight (28) days: (a) of the service date of the final order; (b) of an order denying petition for reconsideration; or (c) the failure within twenty-one (21) days to grant or deny a petition for reconsideration, whichever is later. *See Idaho Code § 67-5273.* The filing of an appeal to district court does not in itself stay the effectiveness or enforcement of the order under appeal.

Dated this 24th day of June, 2010.

A handwritten signature in black ink that reads "Gary Spackman". The signature is written in a cursive style and is positioned above a horizontal line.

GARY SPACKMAN
Interim Director

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of June, 2010, the above and foregoing, was served by the method indicated below, and addressed to the following:

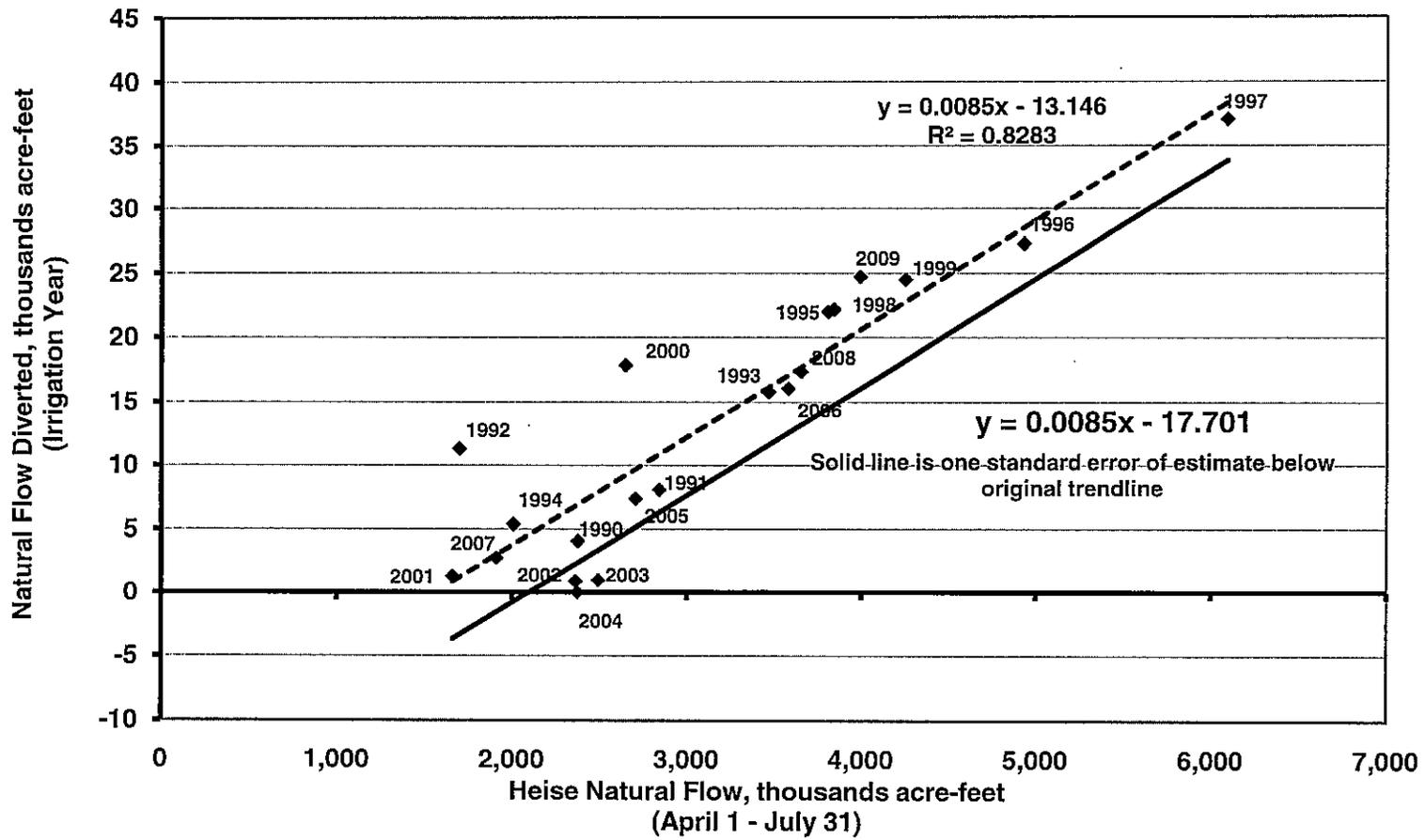
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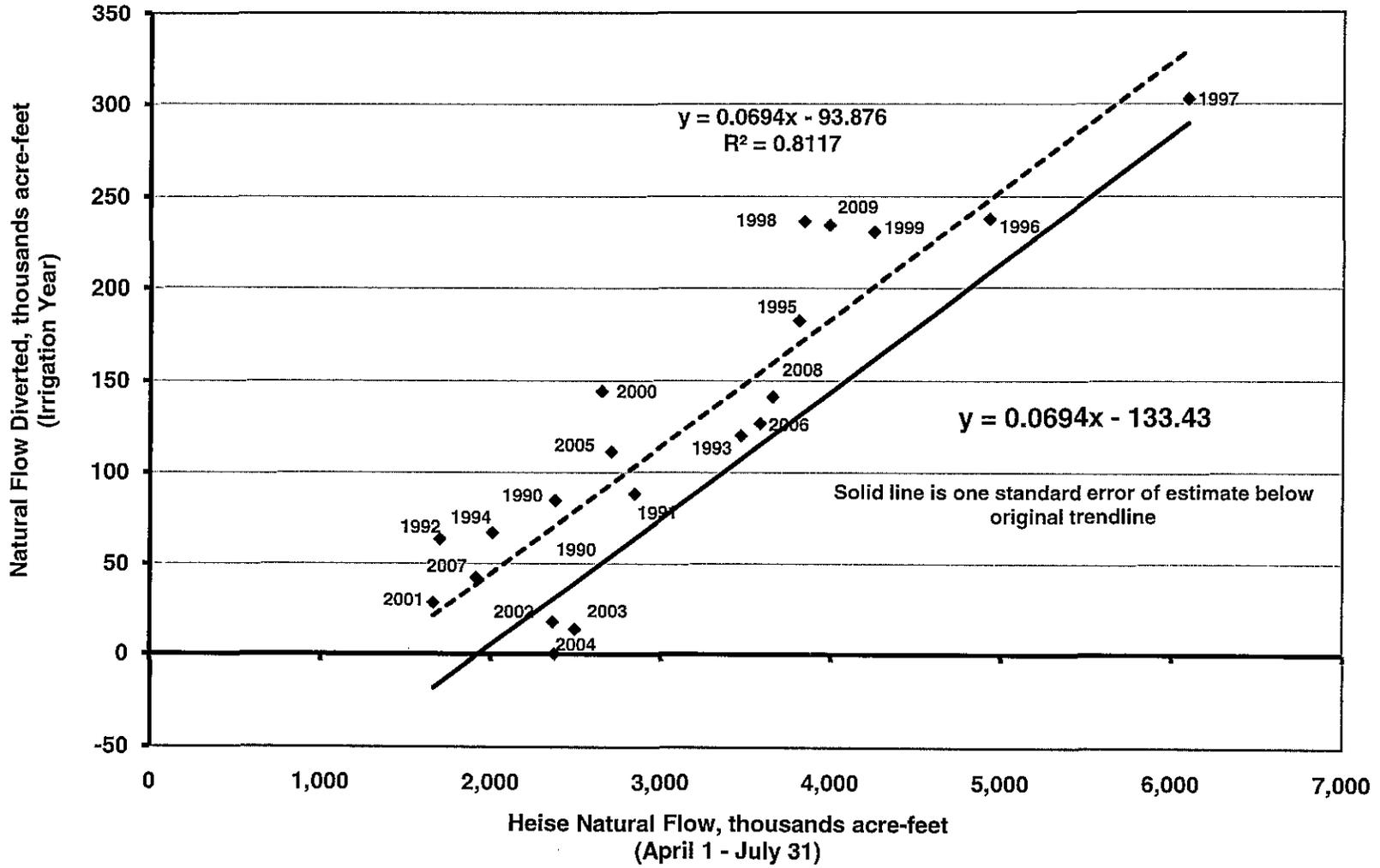
<p>Allen Merritt Cindy Yenter IDWR—Southern Region 1341 Fillmore St., Ste. 200 Twin Falls, ID 83301-3033 allen.merritt@idwr.idaho.gov cindy.yenter@idwr.idaho.gov</p>	<p><input type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email</p>
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Victoria Wigle
Administrative Assistant to the Director

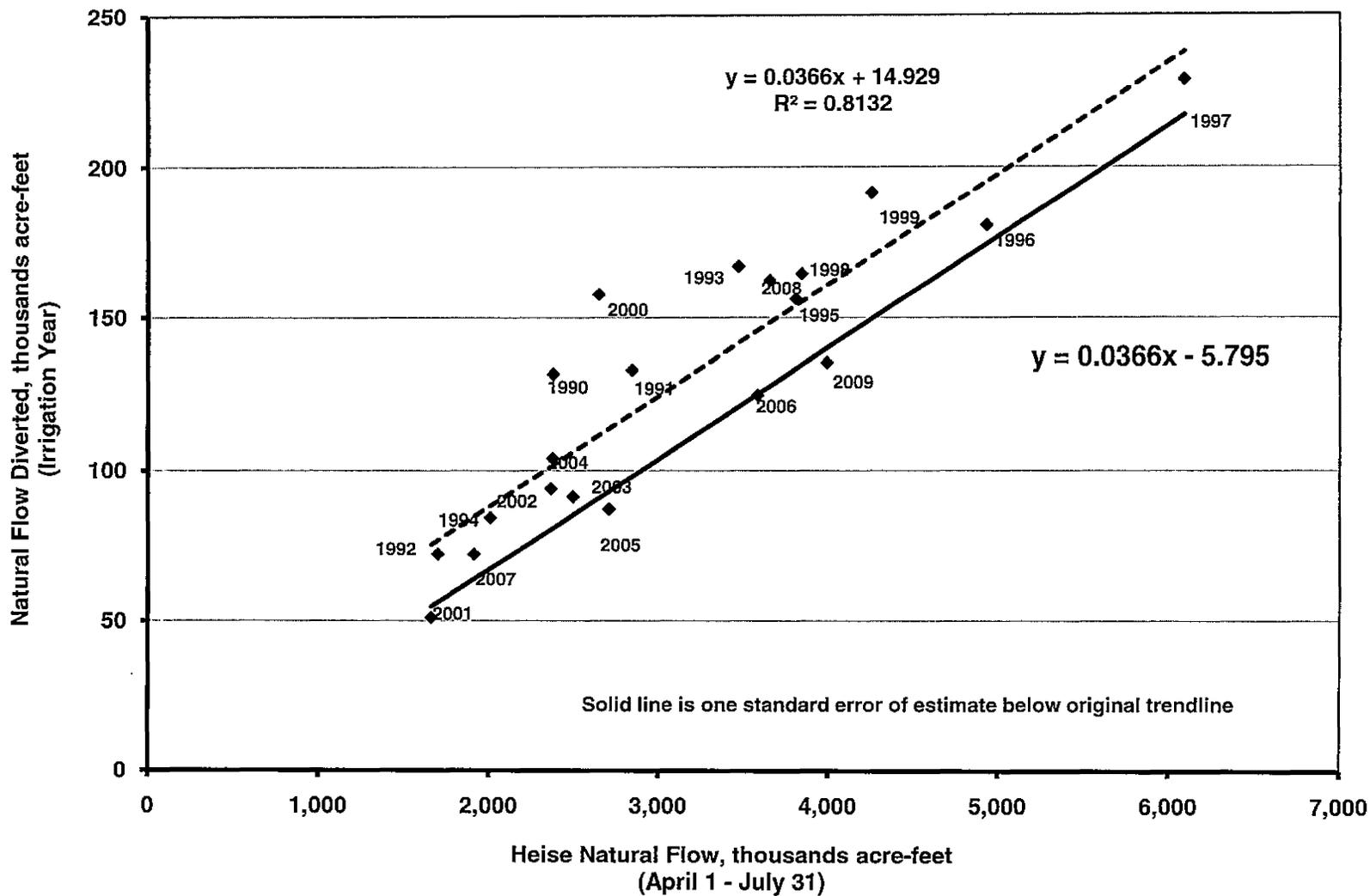
A & B IRRIGATION DISTRICT
Natural Flow Diversions with Heise Inflow



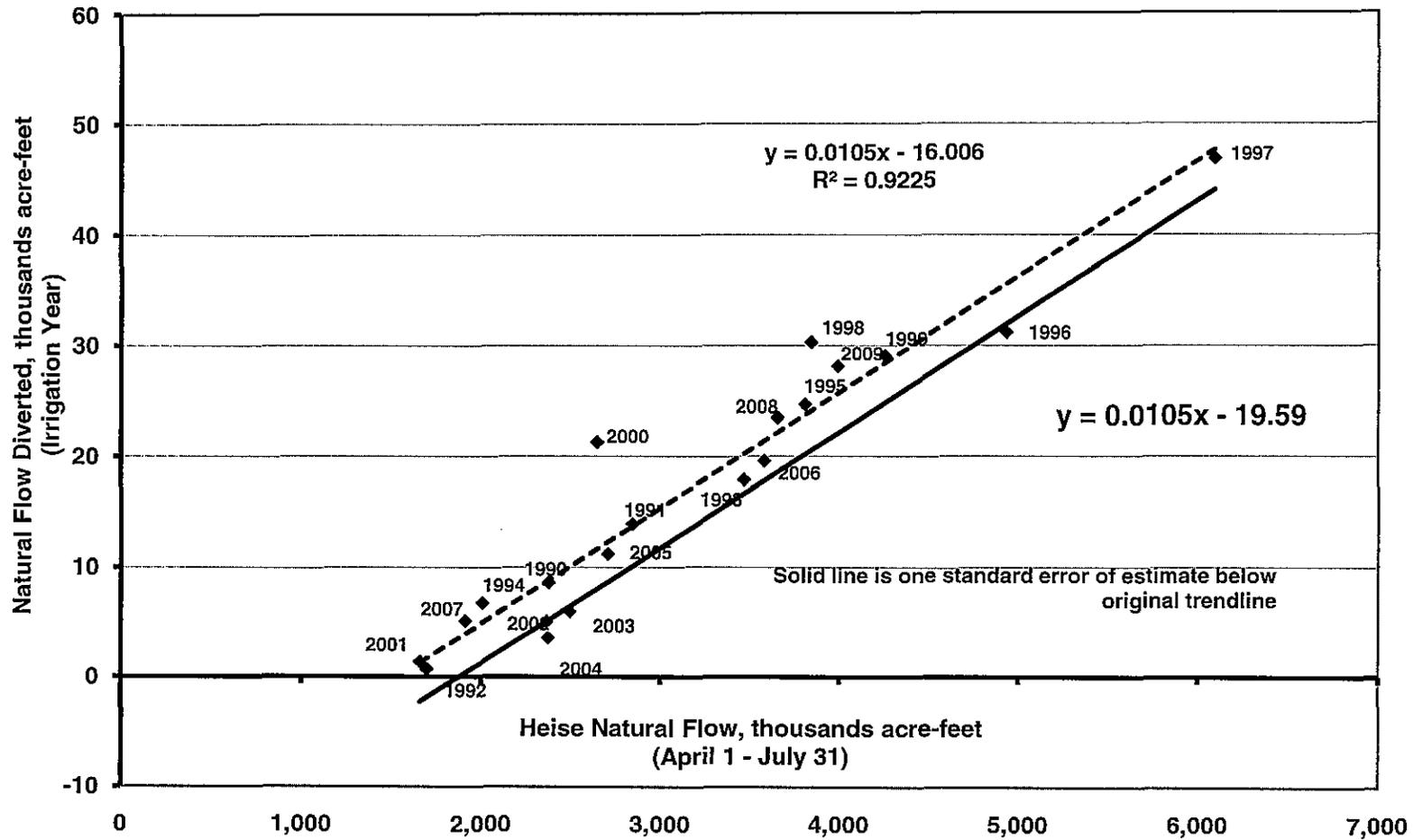
**AMERICAN FALLS RESERVOIR DISTRICT #2
Natural Flow Diversions with Heise Inflow**



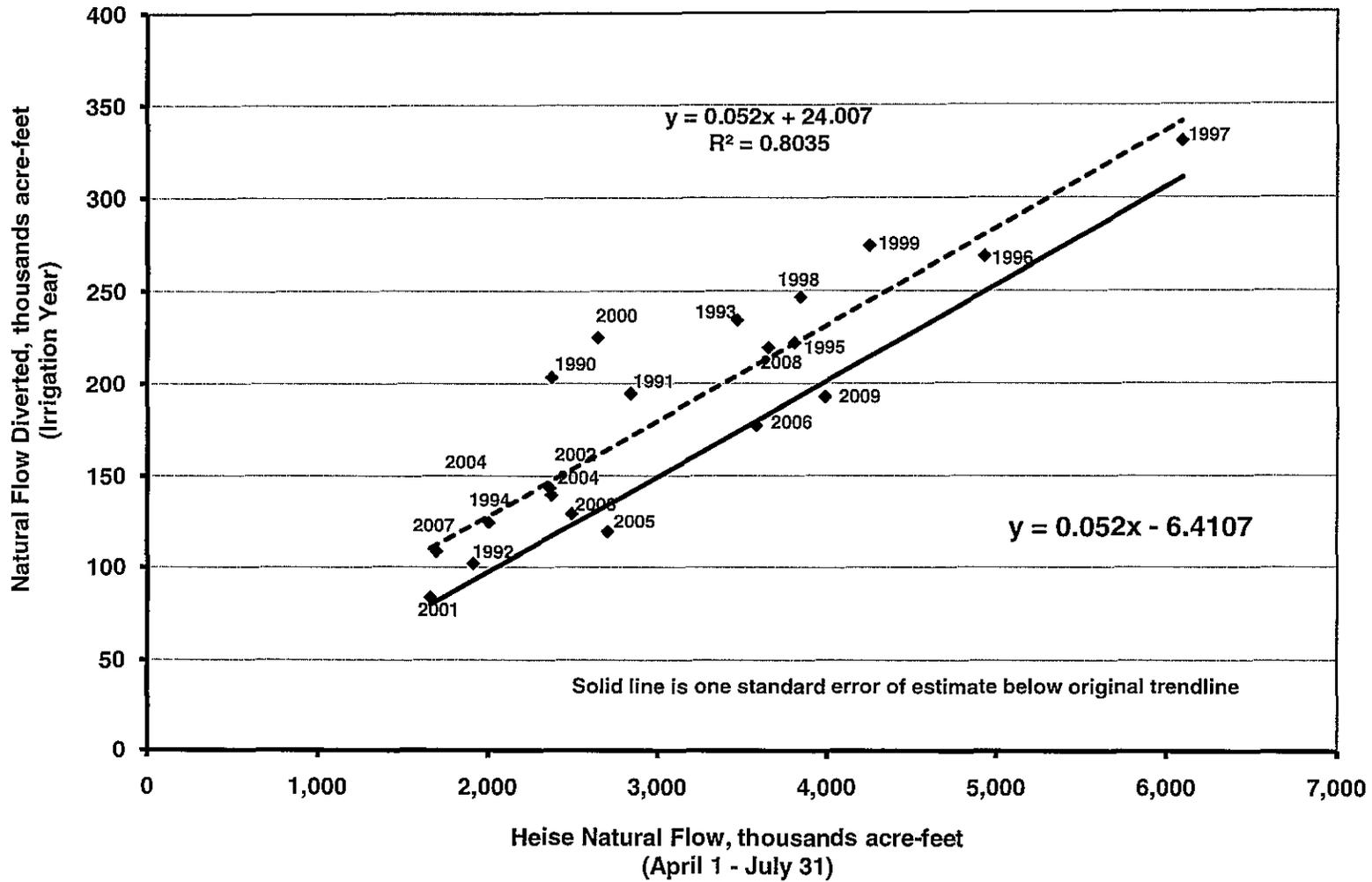
BURLEY IRRIGATION DISTRICT Natural Flow Diversions with Heise Inflow



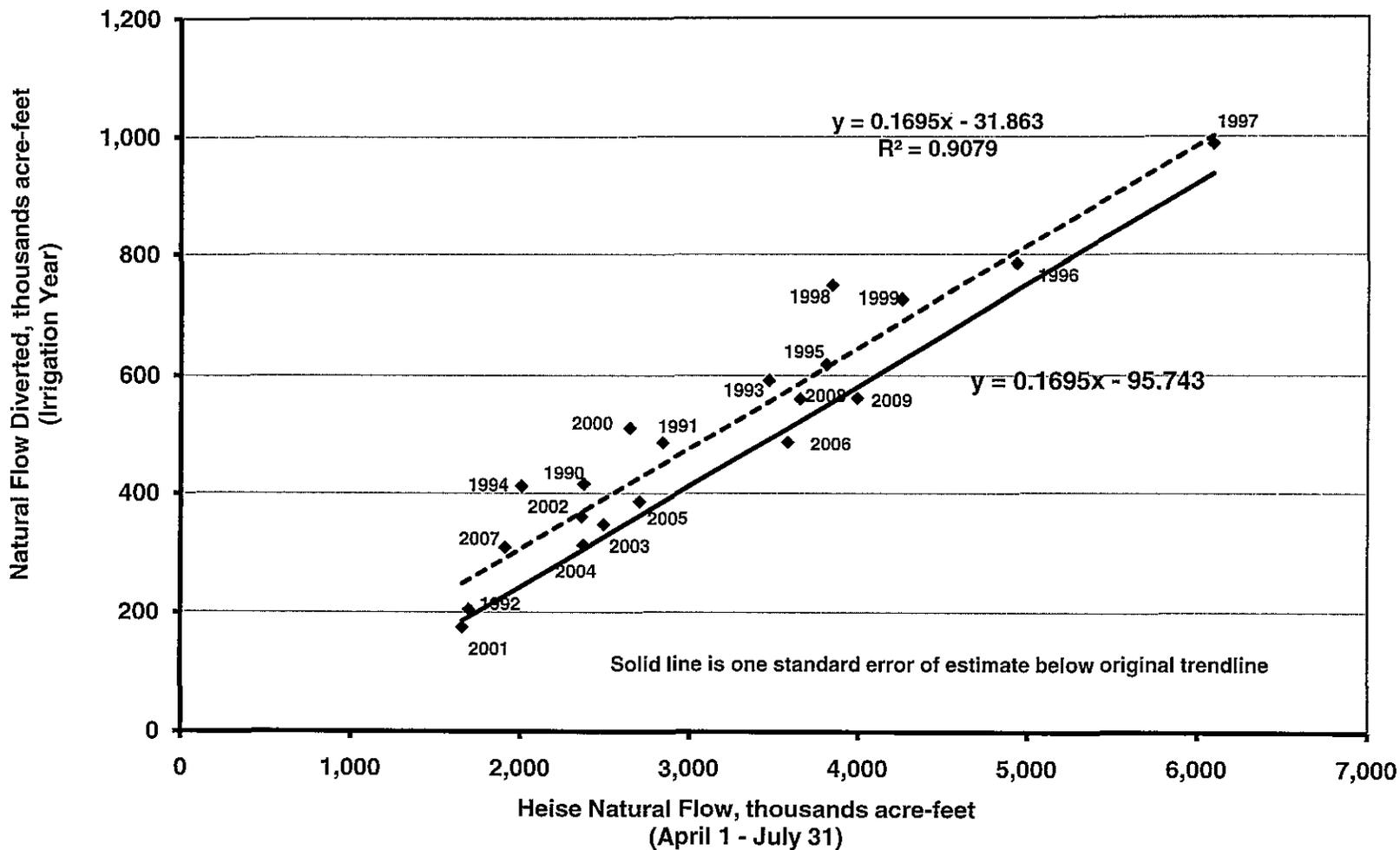
MILNER IRRIGATION DISTRICT Natural Flow Diversions with Heise Inflow



MINIDOKA IRRIGATION DISTRICT Natural Flow Diversions with Heise Inflow



NORTH SIDE CANAL COMPANY
Natural Flow Diversions with Heise Inflow



TWIN FALLS CANAL COMPANY
Natural Flow Diversions with Heise Inflow

