

ROBERT E. WILLIAMS
IDAHO STATE BAR NO. 1693
WILLIAMS, MESERVY & LOTH SPEICH,
LLP
Attorneys at Law
153 East Main Street
P. O. Box 168
Jerome, Idaho 83338
Telephone: (208) 324-2303
Facsimile: (208) 324-3135
rewilliams@cableone.net

CANDICE MCHUGH
IDAHO STATE BAR NO. 5908
CHRIS M. BROMLEY
IDAHO STATE BAR NO. 6530
MCHUGH BROMLEY, PLLC
Attorneys at Law
380 S. 4th St., Ste. 103
Boise, ID 83702
Telephone: (208) 287-0991
Facsimile: (208) 287-
cmchugh@mchughbromley.com
cbromley@mchughbromley.com

*Attorney for Cities of Bliss, Buhl, Burley,
Carey, Declo, Dietrich, Gooding, Hazelton,
Heyburn, Jerome, Paul, Richfield, Rupert,
and Wendell*

*Attorneys for Cities of Bliss, Buhl, Burley,
Carey, Declo, Dietrich, Gooding, Hazelton,
Heyburn, Jerome, Paul, Richfield, Rupert,
and Wendell*

**BEFORE DEPARTMENT OF WATER RESOURCES
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

Docket No. CM-DC-2010-001

AFFIDAVIT OF CHRISTIAN PETRICH

STATE OF IDAHO)
):ss.
COUNTY OF ADA)

CHRISTIAN PETRICH, being first duly sworn deposes and says:

1. I have been employed by the Coalition of Cities to assist them in the above listed matters.
2. I have investigated and am familiar with the water rights held by all members of the Coalition of Cities.

3. I am familiar with the Director's Final Order Regarding April 2015 Forecast Supply (Methodology Steps 1-3) signed on April 16, 2015 where the Director requires junior groundwater users to secure 89,000 acre-feet of storage water to mitigate for injured members of the Surface Water Coalition.
4. The injured members of the Surface Water Coalition rely on water supplies in the Near Blackfoot to Neeley and Neeley to Minidoka reaches of the Snake River.
5. I anticipate that a curtailment of groundwater rights with priority dates in and junior to the early 1980s would yield approximately 89,000 acre-feet of water to the Near Blackfoot to Neeley and Neeley to Minidoka reaches of the Snake River under steady state hydraulic conditions.
6. The cities of Bliss, Carey, Declo, Dietrich, Heyburn, Jerome, Paul, Richfield, Rupert, and Wendell own water rights with priority dates junior to 1980. However, consumptive uses can be allocated to water rights with priority dates senior to 1980 in all cities except Carey, Heyburn, and Richfield.
7. The Eastern Snake Plain Aquifer Model (ESPAM 2.1) was run to determine the impacts of consumptive-use depletions by members of the Coalition of Cities with water rights junior to 1980 on the Near Blackfoot to Mindidoka reaches of the Snake River.
8. The depletive amount that will occur to the Near Blackfoot to Neeley and Neeley to Minidoka reaches of the Snake River to as a result of depletions by Coalition cities Carey, Heyburn, and Richfield under water rights with priority dates on or junior to January 1, 1982 is less than four (4) acre-feet under transient hydraulic conditions. Withdrawals for consumptive uses by the remaining Coalition cities (Bliss, Burley, Declo, Dietrich, Gooding, Hazelton, Jerome, Paul, Rupert, Shoshone, and Wendell) can be allocated to water rights with priority dates senior to 1980.
9. The depletive amount that will occur to the Near Blackfoot to Neeley and Neeley to Minidoka reaches of the Snake River to as a result of depletions by Coalition cities Carey, Heyburn, and Richfield under water rights with priority dates on or junior to 1980 under steady-state hydraulic conditions is approximately 300 AF/year.
10. The Coalition of Cities participated in a recharge program at the Gooding Recharge Site starting in February 2015. The recharge program consisted of diverting 1,500 AF into the Milner Gooding Canal and to the Gooding Recharge Site. It was previously projected that approximately 1,000 acre-feet would arrive at the Gooding Recharge Site; the balance would become aquifer recharge via seepage from the Milner-Gooding Canal. (Approximately 756 acre-feet actually arrived at the Gooding Recharge Site; the balance (approximately 744 acre-feet) was recharged the ESPA via seepage from Milner-Gooding Canal.

11. The simulated benefit of this recharge (based on the initial assumption that 1,000 acre-feet would be recharged at the Gooding Recharge Site) to the Near Blackfoot to Minidoka reaches of the Snake River is approximately 1.17 acre-feet between April 1, 2015 and March 31, 2016 and 257.1 acre-feet per year under steady-state hydraulic conditions. The table below summarizes my estimates. The benefit of Coalition recharge between April 1, 2015 and March 31, 2016 is likely greater than 1.17 acre-feet because conveyance losses (i.e., recharge) from the Milner-Gooding Canal, which is closer to the Near Blackfoot to Minidoka reach of the Snake River than the Gooding Recharge Site, was greater than anticipated.

Parameter	Time Frame	Snake River Reach	
		Near Blackfoot to Neeley	Neeley to Minidoka
Simulated aggregate impact of pumping by Richfield, Heyburn, and Carey	4/1/2015 - 10/31/2015 (AF)	0.69	0.01
	4/1/2015 - 3/31/2016 (AF)	3.70	0.07
	Steady state (AF/yr)	282.55	15.74
	Approx. yrs to reach steady state	124	66
Simulated benefit of recharge along Milner-Gooding Canal and in Gooding Recharge Site*	4/1/2015 - 10/31/2015	0.17	0.00
	4/1/2015 - 3/31/2016	1.16	0.01
	Steady state (per year)	243.81	13.29
	Approx. yrs to reach steady state	47	34

*Assume 1005 AF recharged at the Gooding Recharge Site and 495 AF recharged along Milner-Gooding Canal

12. Delivering 50 acre-feet of storage water to the injured members of the Surface Water Coalition at the time of need will more than mitigate for the depletive amount by the Coalition cities of Carey, Heyburn and Richfield for the upcoming year using under transient or steady-state hydraulic conditions.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Dated this 1 day of May, 2015.



Christian Petrich, Ph.D., P.E., P.G.

SUBSCRIBED AND SWORN to before me this 1st day of May, 2015.




NOTARY PUBLIC FOR IDAHO

Residing at Bowen, Idaho

My commission expires: 1/27/2016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of May, 2015, I served a true and correct copy of the foregoing document on the person(s) whose names and addresses appear below by the method indicated:

Director Gary Spackman IDAHO DEPARTMENT OF WATER RESOURCES PO Box 83720 Boise, ID 83720	<input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Hand-Delivered <input type="checkbox"/> Electronic Mail
Deputy Attorney General Attn: Garrick L. Baxter IDAHO DEPARTMENT OF WATER RESOURCES PO Box 83720 Boise, ID 83720-0098 Fax: 208-287-6700 garrick.baxter@idwr.idaho.gov kimi.white@idwr.idaho.gov	<input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail
W. Kent Fletcher Fletcher Law Office P.O. Box 248 Burley, Idaho 83318-0248 wkf@pmt.org	<input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail
John K. Simpson Travis L. Thompson Paul L. Arrington Barker, Rosholt & Simpson 195 River Vista Place, Suite 204 Twin Falls, Idaho 83301-3029 jks@idahowaters.com tlt@idahowaters.com pla@idahowaters.com	<input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail
Sarah Klahn Mitra Pemberton White Jankowski, LLP 511 16 th Street, Suite 500 Denver, Colorado 80202 sarahk@white-jankowski.com mitrap@white-jankowski.com	<input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail

<p>A. Dean Tranmer City of Pocatello P.O. Box 4169 Pocatello, Idaho 83205 dtranmer@pocatello.us</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>
<p>Randall C. Budge T.J. Budge Racine Olson P.O. Box 1391 Pocatello, ID 83204-1391 rcb@racinelaw.net tjb@racinelaw.net</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>
<p>Kathleen Carr U.S. Dept. of Interior 960 Broadway Ste. 400 Boise, ID 83706 Kathleenmarion.carr@sol.doj.gov</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>
<p>David Gehlert Natural Resources Section Environment and Natural Res. Div. U.S. Dept. of Justice 999 18th St., S. Terrace, Ste. 370 Denver, CO 80202 david.gehlert@usdoj.gov</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>
<p>Matt Howard U.S. Bureau of Reclamation 1150 N. Curtis Rd. Boise, ID 83706-1234 mhoward@usbr.gov</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>
<p>William Parsons Parsons, Smith & Stone, LLP P.O. Box 910 Burley, ID 83318 wparsons@pmt.org</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>

<p>Mike Creamer Jeff Fereday Givens Pursley, LLP P.O. Box 2720 Boise, ID 83701-2720 mcc@givenspursley.com jcf@givenspursley.com</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>
<p>Lyle Swank IDWR Eastern Region 900 N. Skyline Dr., Ste. A Idaho Falls, ID 83402 lyle.swank@idwr.idaho.gov</p>	<p><input type="checkbox"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>
<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"/> US Mail, Postage Paid <input type="checkbox"/> Facsimile <input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Electronic Mail</p>



CHRIS M. BROMLEY