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

IN THE MATTER OF DISTRIBUTION OF
WATER TO WATER RIGHT NOS. 36-
02551 AND 36-07694

(RANGEN, INC.)

CM-DC-2014-004

**AFFIDAVIT OF CHRIS M. BROMLEY
IN SUPPORT OF COALITION OF
CITIES' RESPONSE TO RANGEN,
INC.'S MOTION FOR SUMMARY
JUDGMENT**

STATE OF IDAHO)
) ss.
COUNTY OF ADA)

CHRIS M. BROMLEY being first duly sworn upon oath, deposes and says the following:

1. I am an attorney of record for the the cities of Bliss, Burley, Carey, Declo, Dietrich, Gooding, Hazelton, Heyburn, Jerome, Paul, Richfield, Rupert, Shoshone, and Wendell, in the above-captioned matter, and I make this affidavit based upon my own personal knowledge.

2. Attached hereto as **Exhibit A** is a true and correct copy of data obtained from the Idaho Department of Water Resources' website of the *Annual Summary for Water District 36A, Billingsley Creek, 360410089 – D – Rangen Hatchery*, for the period 01/01/2013 – 12/31/2013.

“I certify under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.” Idaho Code § 9-1406.

DATED this 13th day of October, 2014.


CHRIS M. BROMLEY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY That on this 13th day of October, 2014, 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 deborah.gibson@idwr.idaho.gov	Via US Mail, Postage Paid Via 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	Via US Mail, Postage Paid Via Electronic Mail
J. Justin May MAY BROWNING & MAY, PLLC 1419 W Washington Boise, ID 83702 Fax: (208) 342-7278 jmay@maybrowning.com	Via US Mail, Postage Paid Via Electronic Mail
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<p>Randall C. Budge Thomas J. Budge RACINE OLSON NYE BUDGE & BAILEY CHARTERED PO Box 1391 Pocatello, ID 83204-1391 Fax: (208) 232-6109 rcb@racinelaw.net</p>	<p>Via US Mail, Postage Paid Via Electronic Mail</p>
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<p>A. Dean Tranmer POCATELLO CITY ATTORNEY'S OFFICE PO Box 4169 Pocatello, ID 83205 Tel: (208) 234-6148 Fax: (208) 239-6986 dtranmer@pocatello.us</p>	<p>Via US Mail, Postage Paid Via Electronic Mail</p>



CHRIS M. BROMLEY

EXHIBIT A

Annual Summary for Water District 36A Billingsley Creek

360410089 - D - Rangen Hatchery, discharge, cfs, calendar year 01/01/2013 - 12/31/2013

c - Calculated, e - Estimated, i - Interpolated, m - Measured and n - Not Specified

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	17.0i	15.3i	14.2i	12.8m	11.7i	12.0i	11.2m	11.1i	12.2i	15.9i	14.0i	16.7i
2	16.9i	15.2i	14.2i	12.7i	11.7i	12.1i	11.2i	11.1i	12.3m	16.0i	13.9i	16.9m
3	16.8i	15.2i	14.1i	12.6i	11.7i	12.2m	11.2i	11.1i	12.3i	16.1i	13.8i	16.6i
4	16.7i	15.1m	14.1m	12.5i	11.6i	12.2i	11.2i	11.0i	12.3i	16.2i	13.7m	16.3i
5	16.6i	15.0i	14.0i	12.5i	11.6i	12.1i	11.2i	11.0m	12.3i	16.3i	14.1i	16.1i
6	16.5i	15.0i	13.9i	12.4i	11.6m	12.1i	11.2i	11.0i	12.4i	16.4i	14.4i	15.8i
7	16.4m	14.9i	13.7i	12.3i	11.6i	12.1i	11.2i	11.1i	12.4i	16.5m	14.8i	15.5i
8	16.5i	14.9i	13.6i	12.2m	11.5i	12.1i	11.2m	11.1i	12.4i	16.5i	15.2i	15.2i
9	16.5i	14.8i	13.5i	12.2i	11.4i	12.0i	11.1i	11.2i	12.4m	16.4i	15.5i	14.9m
10	16.6i	14.7i	13.4i	12.2i	11.4i	12.0m	11.1i	11.2i	12.6i	16.4i	15.9i	14.8i
11	16.6i	14.7m	13.2m	12.2i	11.3i	12.1i	11.0i	11.2i	12.7i	16.3i	16.3m	14.7i
12	16.6i	14.7i	13.2i	12.3i	11.3i	12.1i	10.9i	11.3m	12.9i	16.3i	16.3i	14.6i
13	16.7i	14.6i	13.1i	12.3i	11.2m	12.2i	10.8i	11.3i	13.0i	16.2i	16.3i	14.5i
14	16.7m	14.6i	13.1i	12.3i	11.2i	12.2i	10.8i	11.3i	13.2i	16.2m	16.3i	14.4i
15	16.5i	14.5i	13.1i	12.3m	11.3i	12.2i	10.7m	11.3i	13.3i	16.0i	16.3i	14.3i
16	16.3i	14.5i	13.1i	12.3i	11.3i	12.3i	10.7i	11.2i	13.5i	15.7i	16.3i	14.2m
17	16.1i	14.4i	13.0i	12.3i	11.4i	12.3m	10.7i	11.2i	13.6i	15.5i	16.3i	14.2i
18	15.9i	14.4m	13.0m	12.4i	11.4i	12.1i	10.7i	11.2i	13.8i	15.3i	16.4m	14.2i
19	15.6i	14.4i	13.0i	12.4i	11.4i	11.9i	10.7i	11.2m	13.9i	15.0i	16.2i	14.2i
20	15.4i	14.4i	12.9i	12.4i	11.5m	11.8i	10.7i	11.3i	14.1i	14.8i	16.1i	14.2i
21	15.2m	14.4i	12.9i	12.4i	11.5i	11.6i	10.8i	11.3i	14.2i	14.6m	15.9i	14.2i
22	15.3i	14.4i	12.8i	12.4m	11.5i	11.4i	10.8m	11.4i	14.4i	14.6i	15.7i	14.2i
23	15.3i	14.4i	12.7i	12.3i	11.5i	11.2i	10.9i	11.4i	14.5m	14.5i	15.6i	14.2m
24	15.4i	14.4i	12.7i	12.2i	11.5i	11.0m	10.9i	11.5i	14.7i	14.5i	15.4i	14.2i
25	15.5i	14.4m	12.6m	12.1i	11.5i	11.0i	11.0i	11.6i	14.9i	14.5i	15.2m	14.1i
26	15.6i	14.4i	12.6i	12.0i	11.5i	11.1i	11.0i	11.6m	15.1i	14.5i	15.5i	14.1i
27	15.6i	14.3i	12.7i	11.9i	11.5m	11.1i	11.1i	11.7i	15.3i	14.4i	15.7i	14.0i
28	15.7m	14.3i	12.7i	11.8i	11.6i	11.1i	11.1i	11.8i	15.4i	14.4m	16.0i	14.0i
29	15.6i	--	12.7i	11.7m	11.7i	11.1i	11.2m	11.9i	15.6i	14.3i	16.2i	13.9i
30	15.5i	--	12.8i	11.7i	11.8i	11.2i	11.2i	12.0i	15.8m	14.2i	16.4i	13.9m
31	15.4i	--	12.8i	--	11.9i	--	11.1i	12.1i	--	14.1i	--	13.9e
Total:	498.9	410.0	409.1	368.1	356.6	353.6	340.5	351.5	407.3	478.5	465.8	456.9
Mean:	16.1	14.6	13.2	12.3	11.5	11.8	11.0	11.3	13.6	15.4	15.5	14.7
Min:	15.2	14.3	12.6	11.7	11.2	11.0	10.7	11.0	12.2	14.1	13.7	13.9
Max:	17.0	15.3	14.2	12.8	11.9	12.3	11.2	12.1	15.8	16.5	16.4	16.9
AC-FT:	989.6	813.2	811.5	730.2	707.2	701.4	675.4	697.1	807.8	949.1	923.9	906.2