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RECEIVED
MAY 28 2010
DEPT. OF WATER RESOURCES
SOUTHERN REGION

Attorneys for South West and Goose Creek Irrigation Districts

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF DISTRIBUTION)	SOUTHWEST AND GOOSE CREEK
WATER TO SURFACE WATER)	IRRIGATION DISTRICTS MITIGATION
COALITION, AMERICAN FALLS)	PLAN-RE SURFACE WATER COALITION
RESERVOIR DISTRICT #2, MILNER)	
IRRIGATION DISTRICT, MINIDOKA)	
IRRIGATION DISTRICT, A&B)	
IRRIGATION DISTRICT, NORTHSIDE)	
CANAL COMPANY, TWIN FALLS)	
CANAL COMPANY, BURLEY)	
IRRIGATION DISTRICT)	
)	
(SURFACE WATER COALITION))	
)	
)	
)	

COMES NOW South West Irrigation District (SWID) and Goose Creek Irrigation District (GC), (collectively SWID/GC) and through the undersigned counsel, and on behalf of their respective Landowners and those ground water users who are participants with SWID and GC in mitigation activities, and hereby provide this Ground Water Users' Mitigation Plan 2010 to provide non-use of appurtenant ground water rights and aquifer recharge waters which will prevent any injury to the senior surface water rights for the American Falls Reservoir District #2, A&B Irrigation District, Minidoka Irrigation District, Burley Irrigation District, North Side Canal Company, Milner Irrigation District, and the Twin Falls Canal Company. SWID/GC have entered into agreements with the ground water users not in the respective districts to provide mitigation for their ground water use and mitigation obligations.

Thus, this 2010 Plan includes these entities and Landowners and provides them sufficient mitigation to meet their requirements.

On April 7, 2010, the Director of the Idaho Department of Water Resources (hereafter referred to as Department) issued the *Final Order Regarding Methodology for Determining Material Injury to Reasonable In-season Demand and Reasonable Carryover*. This order followed a methodology for determining the need for mitigation for the 2010 irrigation season. The order concluded that certain ground water rights would be curtailed during the 2010 irrigation season to provide reach gains for the Surface Water Coalition (“Coalition”). The total volume was calculated to be 84,300 AF. Shortly thereafter, Dr. Allan Wylie, the Department modeler ran the model to determine the mitigation responsibility for each Water District, Ground Water District, and Irrigation District. On May 17, 2010, the Director issued *Order Regarding IGWA Mitigation Obligation* reducing the total mitigation responsibility to 68,400 AF. On April 19, 2010 Dr. Wylie produced documentation determining the total amount of mitigation responsibility for SWID/GC for the 2010 irrigation season is 5,997 AF gain to the Near Blackfoot to Minidoka reaches of the Snake River (See Appendix 1).

SWID/GC are members in full standing within IGWA; however, *BE IT KNOWN* that SWID/GC are not included in any of the IGWA mitigation plans or activities. SWID/GC will provide mitigation activities and mitigation plans for their own benefit to cover their landowners and the specified non Landowners in the respective districts needing mitigation listed within this mitigation plan. In addition, no mitigation provided by SWID/GC will be counted for IGWA mitigation without a specified submittal to the IDWR. This fact removes the mitigation responsibility of SWID/GC from IGWA lessening IGWA’s mitigation obligation. This fact also determines that SWID/GC are not responsible for any IGWA mitigation obligations.

This 2010 Plan may be considered as a replacement water plan for approval pursuant to Idaho Code 42-602 and as a mitigation plan pursuant to Conjunctive Management Rule 43, IDAPA 37.03.11.043.

I. RESERVATION OF DEFENSES

- A. By submitting this 2010 Plan, the petitioners do not waive and expressly reserve any and all objections and defenses they have made to the Director's Orders whether individually or through counsel of related groups including Idaho Ground Water Appropriator's (IGWA) or counsel.

II. INTRODUCTION

- A. The Director's Orders require the Ground Water Users to provide mitigation or replacement water in lieu of involuntary curtailment of ground water rights located in Water District 140. ESPAM model runs determined the apportioned amount of obligation of SWID/GC for the Near Blackfoot to Minidoka reaches of the Snake River to be 5,997 AF (see Appendix 1). In addition, there is as yet undetermined an amount of mitigation obligation by the non district Landowners users in WD 140 that are included in this mitigation plan and covered by the SWID/GC activities (see Appendix 2). The total obligation of mitigation by SWID/GC is accomplished through replacement water conversion, voluntary curtailment of acres, and recharge.
- B. This mitigation plan will be a living document considering the variability of the sources of mitigation for the SWID and GC. That is to say that the availability of surface water used for soft conversions and recharge varies from year to year. Therefore, the exact amount of mitigation each year will vary relative to the availability of surface water. Each year's mitigation plan cannot be submitted until the end of the water year in order to determine the total amount of mitigation.

C. All mitigation must be included within the boundaries of the Eastern Snake Plain Aquifer (ESPA) boundary established by the IDWR. All activities included within this mitigation plan are within the ESPA. SWID/GC conducts as many mitigation activities outside the ESPA as they accomplish inside. In fact, the boundary cells of the model bordering the Snake River on the southwest side, near Murtaugh, do not reflect the effects of mitigation activities by SWID/GC. However, no mitigation credit is given for these activities and none are included in this plan.

III. MITIGATION PLAN ACTIVITIES

A. SWID/GC mitigation activities have been ongoing for more than 20 years. The ongoing activities have been known by Department Staff and Directors. Many IDWR staff and the 2 preceding Directors have toured the SWID/GC areas and have witnessed the replacement acres and recharge efforts. Efforts delineated in this plan include but are not limited to surface water replacement (soft conversions), voluntarily curtailed acres with valid water rights (CREP and individual voluntary curtailment), and recharge by injection and infiltration.

1. Soft Conversions on the J Canal

- a. Beginning in 1997, members of SWID have been purchasing waste water from Burley Irrigation District. In addition, SWID purchased a surface water right, 01-23A, to use for soft conversions. Irrigators constructed head gates in the J Canal of the BID system and pumped water south through individually owned and SWID owned pipelines to irrigate farmland within the boundaries of the SWID/GC. BID dealt with each farmer individually in their delivery.
- b. In 2003, BID completed the purchase of their canal system from the Bureau of Reclamation and began dealing with SWID as an entity; delivering water to SWID through the various private head gates designating SWID comptroller of delivery. In addition to head gates in the J Canal, SWID constructed a catchment basin at the end of

the canal system to collect waste water. Waste water from the canal system is collected in the pond and pumped to member farmland to replace ground water pumping.

- c. Initially SWID Directors designated that 1 AF of surface water from the BID required 1 AF less of ground water pumping. However, the soft conversions began prior to implementation of measuring and reporting requirements in SWID. Strict records of ground water use were not recorded as they are today. Without strict measuring and reporting as verification, irrigators assumed they were replacing equal amounts of ground water with surface water. Mostly due to the then ability to provide the required water onto previously sparsely watered ground the volume of surface water pumped did not equal the volume of ground water not pumped. As a result, the ratio of surface water pumped to the volume of ground water not pumped is 1 AF surface water to 0.5 AF ground water.
- d. Since soft conversions began prior to the requirement of exact measurement of ground water pumping, total discharge for each pumping system was calculated using the Power Consumption Coefficient (PCC). Future plans for measurement include metering each diversion system. However, for this mitigation plan each member receiving surface water from the BID canals have had PCC's measured for each pumping system on their farm. Total volume usage was averaged for each system since 2003. An average usage was calculated and measured in negative volumes. This methodology produced a calculated average for the volume of ground water not pumped. Pumping totals are included on the following table. See Appendix 2 for records and calculations.
- e. As previously stated some members began diverting water from the BID prior to keeping records for mitigation. In fact, several of the wells have not been used since the head gates were constructed. Therefore, these wells have no record of usage. In these cases the average usage, accepted by IDWR, of 2⁷/ac was applied to the entire farm for mitigation credit.

Table 1. Average Soft Conversion Mitigation for Head Gates in the BID J Canal and SWID Waste Water Pond.

Name	Average Mitigation KWHr	Average Mitigation AF	Average Mitigation Acres
Jackson Allred	-1,059,085	-1,319	-660
Beck Brothers *	-621,447	-1,281	-641
Paul Christensen *	0	-780	-390
V & R Farms	-226,720	-259	-129
Grant Wyatt	-158,333	-188	-94
Fred Hawker *	-215,613	-613	-307
Heward/Wrigley	-1,137,697	-1,147	-573
Craig Larsen *	-709,860	-1,577	-789
LDS Church	-3,212,243	-3,008	-1,504
Matthews	-50,467	-84	-42
Burley West Invst. *	0	-718	-359
Scott Searle	-316,500	-345	-172
Moo View Cow Plc.	-2,773,727	-2,704	-1,352
Alliance Land	-674,643	-379	-190
Wayment Farms	-640,340	-549	-275
Total:	-11,796,675	-14,952	-7,476

*Indicates no power records for 1 or more of the wells included in the calculations due to non-use prior to recording measurements.

- f. At the request of SWID/GC the IDWR modeling group modeled the effect of the soft conversions on the J Canal. The data supplied to the modeling department was conservative at just under 13,600 AF while the actual mitigation is listed in the above table at 14,952 AF. The preliminary results indicated that the effect of the soft conversion on the J Canal add 6,266 AF (8.65 cfs) to both reaches of the river (see Appendix 3). Of course, IDWR reserves the right to re-model the results after verification of the data.
- g. SWID is committed to tightening the ratio between surface water received and less ground water pumped. As a result, less ground water will be pumped and the net non-use of ground water will increase dramatically in future mitigation plans; evidence that mitigation plans for SWID/GC are dynamic.
- h. Recognition must be placed for previous mitigation by SWID/GC. As stated previously, many IDWR staff and Directors have toured the SWID mitigation activities. Knowledge of these mitigation activities have been known since activity inception (1997). However,

IDWR has yet to include these pumping reductions in the ESPAM model runs determining mitigation obligations for all junior water right holders. This oversight has wrongly calculated increased mitigation obligations for Water Districts 130 and 140. Therefore, SWID/GC claim average non-use mitigation practices from the J Canal for each year since 2003.

- i. Average annual mitigation along the J canal since 2003 has been 14,952 acre feet. According to the ESPAM model run by the IDWR, the resulting mitigation from SWID/GC since 2003 has been more than (due to the conservative data presented to the IDWR for modeling) 43,862 AF [(6,266 AF)(7 yrs)] equaling 60.55 cfs to the Near Blackfoot to Minidoka spring reach [(8.65 AF)(7 yrs)].
- j. Soft conversions will continue in the future for SWID/GC. SWID currently has 5 year contracts with several entities from whom they lease water. The entities include BID, City of Pocatello, Falls Irrigation Company, Milner Irrigation District, and Minidoka Irrigation Company. As contracts increase in the future soft conversions will increase. Higher non-pumping mitigation will occur in future years. *In fact, because SWID/GC mitigation activities are a part of the SWID/GC Ground Water Management Plan mitigation activities will continue even through years when there are no curtailment orders.*

2. West Cassia Pipeline, LLC

- a. A recently completed pipeline adds tremendously to the mitigation of SWID/GC. Some Landowners within SWID/GC partnered with SWID/GC and formed the West Cassia Irrigation, LLC (WCI). The pipeline consists three (3) 24 inch pipelines extending about thirteen (13) miles South from the Snake River to Golden Valley capable of pumping more than 2,700 inches of water. The water is pumped from the Snake River to the Golden Valley Area approximately 13 miles south. There are 12 members of the WCI.

- b. A Memorandum of Understanding (MOU) was established and signed prior to construction. The MOU is included as Appendix 4. The MOU states that each member of WCI will decrease ground water pumping in an amount equal to the volume received by the member. The MOU continues to state that the ground water pumping will be monitored by the District Hydrologist. The non-pumping must be verifiable by the WD 140 Watermaster.
- c. The pipeline is fully equipped with calibrated magnetic flowmeters. Flowmeters are placed at the pumping station and each out dive. Flowmeters are also located on recharge locations. The records of meter calibrations and meter totalizer readings are kept in the WCP Hydrologist Logbook housed in the office of counsel for SWID/GC.
- d. Each member of WCI determined a plan to reduce groundwater pumping in an equal amount to surface water received. All the plans have been reviewed and accepted by the District Hydrologist and the Board of Directors for WCI, SWID and GC. Results will be verified by the IDWR after the irrigation season. Table 2 lists the committed reduction of each member of the WCI. Plan specifics are contained in Appendix 5.

Name	Purchased Inches in WCI	Committed Reduction in AF
Skyline Dairy	250"	1,463
Alliance Land & Livestock	100"	563
Triple Ace	100"	563
Double B	300"	1,755
Beck Farms	250"	1,463
Wybenga Farms	200"	1,170
Cranney Farms (including Baker)	500"	2,925
Oak Valley Land	400"	2,340
Anderson Farms	200"	1,170
Hepworth Farms	100"	585
Pickett Ranch & Sheep	100"	585
Total	2,500"	14,580

Table 2. WCI, LLC Membership and commitment.

- e. The pipeline is fully on line. It is expected that approximately 15,000 AF of surface water will be delivered to the members of WCI. An equal amount of ground water will not be pumped in 2010 for inclusion in this mitigation plan.
 - f. Beginning in October of 2009 and running through April 13, 2010, Snake River water was pumped to injection points throughout the WCI area. Injection points include aquifer recharge wells and a flood ditch. Almost 3,000 AF were pumped into recharge locations. Total mitigation from the WCP is 20,000 AF/yr.
 - g. SWID currently has a signed contract with the Water Resource Board for 10,000 AF of recharge water for the 2010 calendar year. It is anticipated that well more than the already injected 3,000 AF will be recharged in 2010.
 - h. The IDWR modeled the effect of the pipeline on the several reaches of the river using the ESPAM model. The modeling effort used the anticipated volumes and locations for data. Results of the modeling are that the WCI will add 11.88 cfs to the Near Blackfoot to Minidoka reach equaling 9,040 AF per year. Again, the IDWR reserves the right to model the results after verification of the data.
3. CREP
- a. There are currently 751 acres enrolled in the CREP within the boundaries of the SWID and GC irrigation districts. The acres are listed and located in Appendix 4. Each CREP acre is given full credit in the mitigation analysis that is one acre CREP is equal to 1 acre mitigation obligation at 2 AF/acre. An additional 751 acres or 1,502 AF per year are added toward the SWID/GC mitigation obligation from the CREP acres (see Appendix 7).
 - b. It is anticipated that there will be no future increase in the amount of acres in the CREP from the SWID or GC irrigation districts.
4. Other Voluntarily Curtailed Acres

- a. There are 2,378 acres with valid ground water rights that have voluntarily curtailed 100%. Two thousand and one acres are in within the SWID boundary and 377 acres inside Goose Creek. Long term commitments (5 years) to keep these acres dry have been obtained from the irrigators. Therefore, the amount of mitigation received from these acres will remain constant.
- b. Initially the voluntarily curtailed acres were submitted in 2001 as a result of a verbal acknowledgement from the IDWR stating the acres voluntarily curtailed for the SWID Ground Water Management Plan would receive protection from forfeiture (oral comm. Tim Luke, and Cindy Yenter). Several versions of the SWID Management Plan were reviewed between 2001 and 2009 but none were accepted by IDWR. Irrigators kept the acres dry according to their commitment. The forfeiture clock remains stopped for these acres as the acres are moved into this mitigation plan.
- c. Owner, associated water right number, and number of acres are included in Appendix 8. A GIS shape file is attached on a disk.

IV. CREDIT

- A. On April 9, 2009, Director Tuthill requested the IDWR modeling department to determine what time is required for the mitigation occurring in SWID to arrive at the receptors; the river and/or the springs. SWID/GC request the IDWR to model the time required for the mitigation to effect the upstream reaches of the river and determine the accrual rate and percentage of the total mitigation activities of SWID/GC. This volume will be applied to SWID/GC for future mitigation.
- B. In Conclusion of Law number 7 of Final Order Approving Mitigation Plans issued May 7, 2010, the Director stated,

The Department will not institute a bookkeeping accounting for the mitigation in excess of what is required. If additional mitigation is required in the future, or other ground water users must provide mitigation, any junior ground water right

holder may propose to the Department that previous activities resulting in simulated reach gains in excess of the mitigation obligation be considered.

While SWID/GC believes that the Department is the best location and entity to maintain such over-mitigation records they understand the budgetary restraints and logistical encumbrances of maintaining such records. The mitigation activities of SWID/GC are well documented and verifiable. Therefore, SWID/GC will maintain the records in the office of their counsel to be applied in future years requiring mitigation. At such times the IDWR may model the previous results as stated in the order quoted above.

- C. SWID/GC also began voluntarily curtailing acres in 2001. As stated in a previous section the total number of acres is 2,378. No credit for these voluntarily curtailed acres is being requested. However, SWID/GC request receipt from the IDWR stating these acres were dried up voluntarily as mitigation and that the forfeiture clock has stopped on these acres.
- D. After verification of the various activities described in this mitigation plan it will be obvious that SWID/GC is over mitigated for the 2010 obligation. As a result, SWID will accrue credit to be carried over to future mitigation.

V. MITIGATION FOR LANDOWNERS NOT IN THE DISTRICTS

- A. Several ground water users isolated within and around the boundaries of SWID/GC are not in either district. This plan provides them sufficient mitigation to meet their obligation. A list of the groundwater pumpers that fall into this category are listed in Appendix 9.
- B. Total water rights for these Landowners equal 27.36 cfs including 545.5 acres. The largest of these is the City of Burley with over 65% of the total.

VI. MITIGATION TABULATION

- A. The mitigation obligation by SWID/GC according to the IDWR is approximately 5,997 AF (8.3 cfs) to the river. According to the unverified model run by the IDWR using conservative data, not including the CREP acres nor the voluntarily curtailed acres, SWID/GC mitigation activities will add 15,306 AF (21.15 cfs) gain to the reaches listed in the orders.
- B. This mitigation plan with attached appendices describes in detail the mitigation activities of SWID/GC. Due to the fact that IDWR has not had an opportunity to verify and model the data contained herein, the total mitigation balance tabulation will be forthcoming.

VII. CONCLUSION

The SWID and GOOSE CREEK request that:

- A. This 2010 SWID and GOOSE CREEK Mitigation Plan be approved; and,
- B. That the Director make a determination that this 2010 Mitigation Plan alleviates any need for additional mitigation or curtailment; and,
- C. This Mitigation Plan fully satisfies all shortages and material injuries; and,
- D. That the IDWR model the complete mitigation activities of SWID/GC and publish the results of said mitigation; and
- E. That the model includes the carry-over volumes (by percentage of total mitigation) and associated accrual times; and,
- D. That the specified carry-over credit be tabulated and records maintained in the office of the SWID/GC counsel to be verified and applied for future mitigation responsibilities; and,

E. SWID/GC reserves the right to modify or withdraw any or all of this plan as necessary to secure approval or comply with the Director's orders.

DATED this 25th day of May, 2010

SOUTHWEST IRRIGATION DISTRICT AND

GOOSE CREEK IRRIGATION DISTRICT

By 

William A Parsons, Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of May, 2010, the above and foregoing, was served by the method indicated below, and addressed to the following:

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**PARSONS, SMITH, STONE, LOVELAND
& SHIRLEY, LLP**

A handwritten signature in black ink, appearing to read "William A. Parsons", written over a horizontal line.

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**SUMMARY OF DIRECTOR'S MAY 17, 2010 ORDER
RE: IGWA MITIGATION OBLIGATION TO SWC**

BACKGROUND:

On April 7, 2010, the Director issued a Final Methodology Order for determining material injury to reasonable in-season demand and reasonable carryover to the SWC. On April 29, 2010, the Director issued his April Forecast Supply Order predicting shortfalls to AFRD 2 of 27,400 AF and to TFCC of 56,900 AF, a total of 84,300 AF. According to the April Forecast Supply Order, if the Ground Water Users don't provide mitigation water, the Director would curtail ground water rights junior to April 5, 1982, affecting 73,782 acres in Water Districts 34, 110, 120, 130 and 140, which would increase the reach gains by 77,985 AF.

IGWA petitioned for reconsideration which was granted by the Director on May 10, 2010.

Since the April Forecast Supply Order precip for April in the Upper Snake was 140% of average and a cool, wet weather pattern continuing in the first part of May delayed snowmelt and irrigation demand. As a result AFRD diverted natural flow in excess of the Director's predicted amount.

ORDER

Based on AFRD 2's actual natural flow diversions, the Director's May 17 Order reduced the prediction of the demand shortfall for the 2010 irrigation season for AFRD 2 to 11,800 AF. The demand shortfall to TFCC remains the same at 56,600 AF, resulting **in a new reduced total SWC mitigation obligation of 68,400 AF.** (FF 8)

For purposes of the 2010 irrigation season, mitigation obligation for junior ground water users was **reduced to 62,232 AF.** (FF 11)

On May 14, 2010, the Director issued an Order which approved IGWA's Mitigation Plan for conversions, dry-ups and recharge, which provide a credit of 5,707 AF. (FF 12) This further reduced the mitigation obligation to the SWC to **56,525 AF.**

IGWA's filings with the Department on May 14, 2010 reflected that 68,000 AF of storage water has been secured for mitigation, with a minimum of 53,000 AF pledged to the SWC delivery call. (FF 16) Based on these filings and the current Order, the remaining shortfall has been reduced to 3,525 AF. (FF 17)

IGWA requested a stay of proceedings pending outcome of its SWC Mitigation Plan case. Based on the foregoing the Director stayed curtailment pending the outcome of proceedings on IGWA's Mitigation Plan which go to hearing May 24. (CL 7, 8)

IGWA 2010 MITIGATION OBLIGATIONS AND CURRENT STATUS

IGWA's current mitigation obligations for 2010 as a result of the May 17, 2010 Order are as follows:

62,232 AF – Total obligation to SWC
(5,707) AF -- Credit for CREP, conversions, recharge)
56,525 AF – Obligation to SWC
27,500 AF – Obligation to conversions in WD 130 per settlement with Clear Springs
84,025 AF – Total storage water needed to meet current 2010 mitigation obligations to TFCC, AFRD 2 and WD 130

Per summary of IGWA water releases for 2010, IGWA currently has 11 Storage Water Leases in place for a total of 73,000 AF. Additionally, we have a verbal commitment from Palisades Water Users of 4,000 AF. Additional storage under negotiation include the following:

5,000 AF – Idaho Irrigation District
5,000 AF – Snake River Valley Irrigation District
10,000 AF – City of Pocatello
Confidential spaceholder
50,000 AF – Rental Pool

Based on this we believe IGWA now can meet the current mitigation obligation as well as secure additional supplies to meet anticipated carryover storage obligations at the end of the irrigation season.

IGWA has submitted an Application to WD01 for 50,000 AF of rental pool water. As of yesterday Lyle Swank predicts that the reservoir system will fill, although there remains some uncertainty. The allocation date is expected to be in early June. Under the Rental Pool rules, once an allocation is made the fill and allocation is published. For the next two weeks the 50,000 AF is subject to lease by others with priority. Based on past experiences, at least 20,000 AF and as much as 45,000 AF may be available from the Rental Pool. This will be the least expensive leased water available as it is based on the Rental Pool rate plus administrative fees. Accordingly the price will either be \$7.40 per AF or \$20.60 per AF if the reservoirs don't fill.

Mitigation amounts attributable to each district per IDWR

Bingham	10,749	17%
Aberdeen - American Falls	30,615	48%
North Snake	1,249	2%
Magic Valley	10,799	17%
Bonneville-Jefferson	4,144	7%
Jefferson Clark	5,948	9%
	63,504	100%

Cary	587	9%
Goose Creek	1,154	18%
Southwest Irrigation	4,843	74%
	6,584	100%

Non-members covered by SWID Mitigation

Name	WR #	CFS	Acres
City of Burley	36-8154	1.2	Industrial
	45-13411	7.8	
	45-7269	3.56	
	45-7436	0.69	
	45-7686	1.75	
	45-7735	4.46	
Ranae Eddings	45-7615	0.07	
Josef Ehrler	45-7377	0.15	5
First Presbyterian Church	45-7529	0.03	1
Farmland Reserve	45-7363	1.66	139
	45-7374	3.1	155
Jim Gochnour	45-7461	0.73	36.5
	45-7510	1.19	90
	45-7277	1.11	101
Springdale Acres	45-13513	non-consumptive heating/cooling	
	45-7375	0.12	domestic
	45-7697	0.31	
Craig Searle	45-13946	0.35	stock
Tessengerlo Kerley	45-7465B	0.14	9
	45-7465C	0.14	9



State of Idaho

DEPARTMENT OF WATER RESOURCES

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C. L. "BUTCH" OTTER
Governor
DAVID R. TUTHILL, JR.
Director

October 26, 2007

Board of Directors
Southwest Irrigation District
PO Box 668
Burley, ID 83318

Board of Directors
Goose Creek Irrigation District
PO Box 207
Oakley, ID 83346

Re: Notice of Meeting to Discuss Ground Water Management Plan

Dear Gentlemen,

At a pre-hearing conference in Burley last month the Director committed to scheduling a meeting between representatives of the Department and the Boards of Directors of Southwest and Goose Creek Irrigation Districts (Districts) to discuss the Districts' ground water management plan. That meeting is scheduled as follows:

Time and Date: 10:00 a.m., November 7, 2007
Location: IDWR Southern Region Office Conference Room
1341 Fillmore St., Suite 200, Twin Falls, Idaho

Attached to this letter is a proposed agenda for the meeting. Department representatives will likely include Tim Luke, Cindy Yenter, Allen Merritt and at least one Hydrology Section staff member. Also attached is an outline of additional data that the Department feels are necessary in order to further evaluate the management plan for the original intended purpose and/or for future potential mitigation purposes.

Please contact either Tim Luke (287-4959) or Cindy Yenter (736-3033) if you have specific questions concerning the scheduled meeting.

Sincerely,

Tim Luke
Water Distribution Section

Enclosures: (1) Meeting Agenda; (2) Outline of Additional Data Required for Review of the Southwest Irrigation District and Goose Creek Irrigation District Proposed Management Plan (Draft 4); (3) Letter to William Parsons from IDWR, December 14, 2006; (4) Service List

AGENDA

**Southwest & Goose Creek Irrigation Districts
Ground Water Management Plan
Discussion of Plan between IDWR and Irrigation Districts**

**Wednesday, November 7, 10:00 pm
IDWR Southern Region Office Conference Room
1341 Fillmore ST., Suite 200
Twin Falls, ID**

Call meeting to order, introductions (10:00 a.m.)	IDWR
Present Objectives/Background/Overview of Plan	Brian Higgs or SWID Rep
Discuss data concerns identified by IDWR	ALL
Discuss timeframes, next steps, alternatives	ALL
Further open discussion/questions	ALL
Adjournment of Meeting (Noon or as needed)	

Idaho Department of Water Resources
Outline of Additional Data Required for Review of the Southwest Irrigation District
and Goose Creek Irrigation District Proposed Management Plan (Draft 4)

The Southwest Irrigation District (SWID) and Goose Creek Irrigation District (GCID) Management Plan (Plan) seeks to satisfy the statutory requirements found in 42-233a to "provide for managing the effects of ground water withdrawals on the aquifer from which the withdrawals are made..". The first five sections of the Plan document the declining ground water trends in the ESPA and in the Oakley Fan, describe the history of ground water development in southern Idaho, and briefly describe the history and purpose of the SWID.

Beginning with Section 6, the Plan describes activities undertaken by the two Districts to conserve and replace groundwater within the boundaries of the four underlying Critical Ground Water Areas (CGWA's). The scope of the Plan from this point forward is essentially limited to the mitigation of approximately 8700 expansion acres found within the CGWA boundaries. The plan has merit in terms of mitigating for the expansion acres. However, the data as presented are not sufficient for a full technical review, and will need to be supplemented in order for that review to occur. Following is an outline of data concerns and/or needs by individual sections of the management plan.

Sec 6. Voluntarily Curtailed Acres

Brian Higgs forwarded to Cindy Yenter an Excel spreadsheet file that contains a list of SWID idled acres by quarter-quarter description. This list almost exclusively identifies 7-acre parcels that appear to be pivot corners. Mr. Higgs indicated that since he first prepared the list, some changes have occurred as dairies have been built or expanded. The Plan also includes in its idled acre count some 5,000 CREP acres. The total number of approved CREP acres in Basin 45 as of October 1, 2007, is only 721 acres (all acres within SWID). The Department realizes more CREP acres may be approved over time.

In order to complete an analysis of voluntary curtailment, the following will be required:

- An updated list of voluntary idled acres, described at minimum by quarter-quarter section. Inclusion of owner names would be helpful. Approved CREP acres do not have to be updated since the Department is already aware of the number and location of approved CREP acres.
- Expanded and detailed map(s) of surface replacement acres, preferably in GIS ArcView or ArcMap shape file format. Otherwise, printed maps may be submitted as follows:
 - minimum size 8.5 X 11 inches, and minimum scale of 1:24,000 (7.5 minute)
 - clearly marked with section, township and range
 - overlain or drawn on aerial photography showing current field configuration
 - if submitting a GIS shape file, table attribute fields should preferably include area of each parcel in acres and owner name

Sec 7. Recharge Waters

The Plan indicates that records of recharge are maintained on the Cottonwood Creek CGWA and Artesian City CGWA injection wells, and that such records have been kept from 1995 to

present. The Department has no records or reports of injection well recharge in these or other areas of the Oakley Fan since 1997. If recharge data are to be integrated into any management or mitigation plan, they will need to be submitted and confirmed. Suggested information:

- Submit any and all annual recharge reports since 1997. Reports should show which wells were used by referring to the PLS locations (quarter-quarter section description) authorized by SWID injection well permits. SWID may also refer to the well designations and names as shown in Department correspondence to Mr. William Parsons dated December 14, 2006.
- Reports should document the method of flow or volume measurement, including type and size of measuring devices.
- SWID should respond to or demonstrate that it has followed up to the compliance actions identified in the Department's December 14, 2006 correspondence (copy attached).

Sec 8. Surface Water Replacement

SWID has developed its surface water distribution system for the purpose of delivering rented water from Burley Irrigation District and Minidoka Irrigation District, up-gradient to irrigated farm lands to replace ground water pumping.

Minimum required information for verification of surface replacement acres:

- An updated list of ground water acres served, described at minimum by quarter-quarter section.
- Expanded and detailed map(s) of surface replacement acres, preferably in GIS ArcView or ArcMap shape file format. Otherwise, printed maps may be submitted as follows:
 - minimum size 8.5 X 11 inches, and minimum scale of 1:24,000 (7.5 minute)
 - clearly marked with section, township and range
 - overlain or drawn on aerial photography showing current field configuration
 - if submitting a GIS shape file, table attribute fields should preferably include area of each parcel in acres and owner name
- A list of measurement locations on SWID pipelines, including type and size of measurement devices used.
- Description or narrative of operational protocol for the surface pipeline – who decides how much water goes where?
- Records of surface water diverted since the beginning of the project.



State of Idaho

DEPARTMENT OF WATER RESOURCES

322 East Front Street • P.O. Box 83720 • Boise, Idaho 83720-0098

Phone: (208) 287-4800 • Fax: (208) 287-6700 • Web Site: www.idwr.idaho.gov

C. L. "BUTCH" OTTER
Governor

GARY SPACKMAN
Interim Director

September 30, 2009

Mr. Brian Higgs, P.G.
6330 West 33rd South
Idaho Falls, ID 83402-5641

Re: Requested ESPA Model Run

Dear Mr. Higgs:

Allan Wylie conducted the model run you requested using the data supplied in your letter dated September 22, 2009. The data are reproduced in Table 1. Allan used the "AF soft conversions" data from your submitted spreadsheet (converted from ac-f/yr to cubic feet per day) as input into the model and used the PLS locations to identify the model cell as shown in Figure 1. Note that the locations you provided in your spreadsheet and shown below are only to the nearest section. The model grid is 1 mi X 1 mi but rotated 31.4°, so the sections and grid don't line up. Allan selected the model grid cell that intersected the largest portion of the Southwest Irrigation District (SWID) and the section.

Table 1. Southwest soft conversions.

Name	Location	AF soft conversions	Acres @ 2'/ac
Christensen	10S 22E 33	-780	390
Larson	10S 22E 34	-853	427
Wyatt	11S 22E 10	-154	77
Hawker	11S 22E 10	-308	154
LDS Church	11S 22E 25	-1,226	613
LDS Church	11S 22E 26	-1,227	613
Beck	11S 22E 4	-1,311	656
Larson	11S 22E 5	-854	427
Wayment	11S 23E 26	-457	229
Allred	11S 23E 27	-735	367
Matthews	11S 23E 29	-151	76
C. Searle	11S 23E 32	-1,089	545
Allred	11S 23E 34	-735	367
Walker	11S 24E 11	-105	53
Stoker	11S 24E 22	-304	152
Gibby	11S 24E 29	-600	300
S. Searle	11S 24E 29	-385	193
Heward	11S 24E 31	-874	437
K. Searle	11S 24E 31	-725	363
K. Searle	11S 24E 32	-725	362

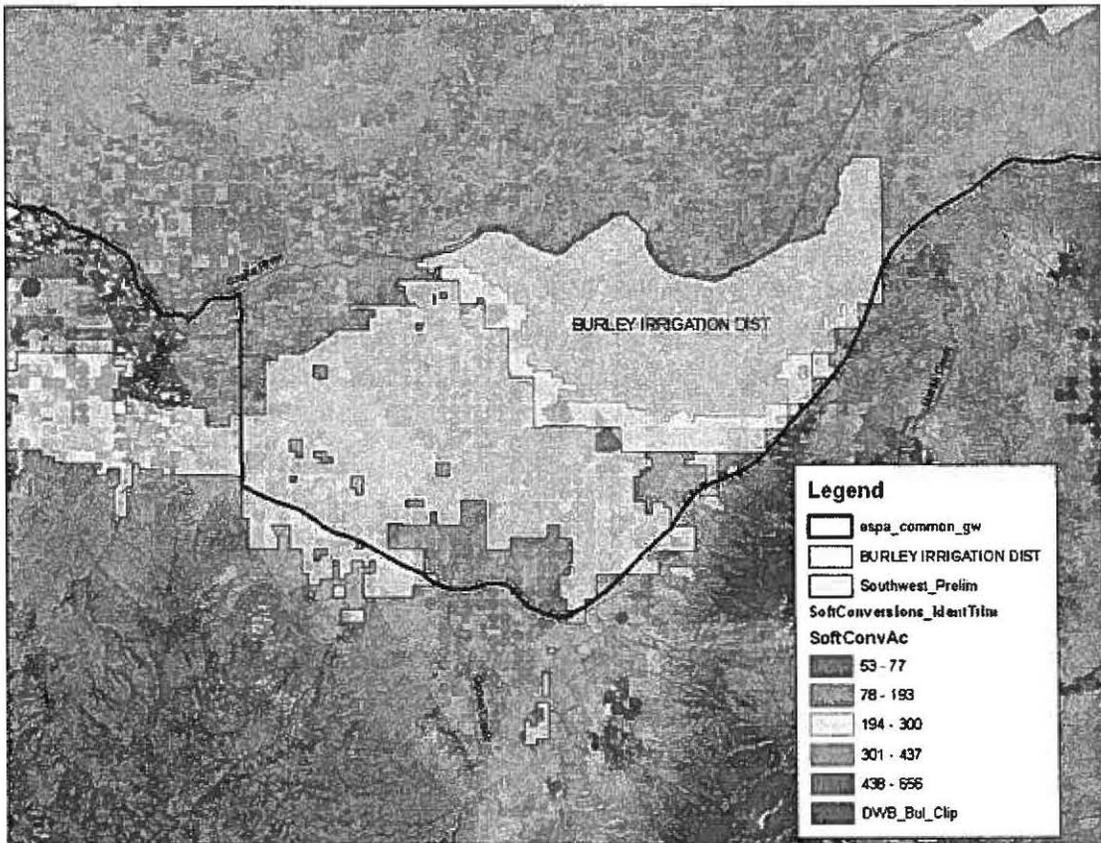


Figure 1. Location of soft conversions.

Allan ran the ESPA Model to compute the benefit to the river reaches. Table 2 shows the benefit by model reach. The Devils Washbowl to Buhl reach is highlighted for you because we understand that the proposed mitigation is intended to offset depletions to Blue Lakes. All of your mitigation sites are within the Devils Washbowl to Buhl trim line and the near Blackfoot-Minidoka trim line. None of your mitigation sites are within the Buhl-Thousand Springs trim line.

Table 2. Modeled benefit for proposed mitigation.

reach	cfs	ac-ft/yr
Ashton-Rexburg	0.20	145
Heise-Shelley	0.23	166
Shelley-nr Blackfoot	1.71	1,242
nr Blackfoot-Neeley	6.01	4,355
Neeley-Minidoka	2.64	1,911
Devils Washbowl-Buhl	4.47	3,238
Buhl-Thousand Spgs	1.55	1,124
Thousand Spgs	0.97	702
Thousand spgs-Malad	0.10	75
Malad	0.87	628
Malad-Bancroft	0.03	24

September 30, 2009

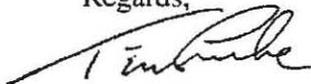
p. 3

Since you refer to these as "soft conversions", you should be aware based on your experience working with similar conversion projects in the North Snake Ground Water District, that the Department would need more specific data from Southwest Irrigation District (SWID) in evaluating these "soft conversions" as part of any mitigation plan submitted pursuant to the conjunctive management rules. As a result, the benefit value projected in this model run may differ from the results of future model runs conducted by the Department. Detailed information required by the Department may include the same data that were outlined in an attachment to Department correspondence that was sent to SWID on October 26, 2007 (see attached copy). Additionally, the Department may require more specific well location data or identification of ground water wells and water rights involved in any "soft conversion" projects. Additionally, the Department will need accurate measurement of wells involved in "soft conversions" for purposes of post-audit mitigation credit analysis. You may wish to refer to the following Department Order and web link that outlines how we compute benefit for soft conversions in North Snake Groundwater District:

(http://www.idwr.idaho.gov/News/WaterCalls/1000Spring%20Users%20Calls/archive_PDFfiles/Blue%20Lakes%20Order%20042906.pdf) .

Please contact Allan Wylie or me directly if you have any questions regarding the model run or questions related to mitigation. The Department urges you to submit a mitigation plan under the Conjunctive Management Rules as soon as possible so that a hearing can be scheduled for a SWID plan and the plans already submitted by other districts. Mitigation plans have been submitted and advertised for the North Snake, Magic Valley and Carey Valley Ground Water Districts, and the A&B Irrigation District. Delays in submitting a plan could result in a separate and delayed hearing for SWID, and create a scenario where SWID and other ground water users in Water District 140 are not included in any approved mitigation plan for 2010. This scenario could put ground water right holders within SWID at risk of possible curtailment in 2010.

Regards,



Tim Luke

Water Distribution Section

Attachment: IDWR Correspondence to Southwest Irrigation District, October 26, 2007

Cc: Cindy Yenter, Water District 140 Watermaster
Bill Parsons, Southwest Irrigation District Attorney
Allan Wylie, IDWR

Memorandum of Understanding Southwest Irrigation District –West Cassia Pipeline Users

The Undersigned do hereby agree to purchase and install the West Cassia pipeline to deliver supplemental water to the western part of Southwest Irrigation District. The pipeline will convey soft conversion water to mitigate part of the requirements that Southwest Irrigation District groundwater users has to provide replacement water to satisfy calls made within the Snake River Aquifer against Water District 140 which includes SW Irrigation District and Goose Creek Water District. It will also supply water to conserve ground water to increase the efficiency of our wells, save approximately 20 % power costs and aid in meeting Southwest's Mitigation Plan.

Southwest Irrigation Water District will be the quasi-legal entity that will represent the participants in the proposed pipeline with the State of Idaho and we will operate the system under their authority. The pipeline will be owned by the landowners that purchase shares in the system and management will be subordinated to Southwest for the administration of the water management and compliance issues.

The participants agree to the following requirements.

1. Participants agree to shut off groundwater pumping to offset the amount of water they receive from the West Cassia pipeline which is operated and managed under the authority of Southwest Irrigation District. The District's Hydrologists Brian Higgs will review each water user's water rights and approve and monitor their compliance in conjunction with a Steering Committee which represents the landowners in the management and compliance issues.
2. All wells that are curtailed must be producing wells with legal water rights that equal the amount of water received from the pipeline. In cases where well reconstruction is necessary after the pipeline commences to deliver water, all parties agree to receive the approval of the Steering Committee along with the SW Irrigation Hydrologists and receive permission in writing from SW Irrigation District to improve or replace an existing well. Each user agrees to not pump in excess of their legal licensed water right per acre which includes the combination of the soft conversion water and groundwater pumping.
3. If the group of pipeline owners agree to implement a management plan within the affected area all parties will be bound by those standards. All of the participants must vote in favor of the standards. If a landowner reduces acreage irrigated by shutting off corners the Steering committee has the right to make recommendation to SWI to give them credit for the reduction.
4. Assessments will be made upon the basis of water received from this project with power, maintenance, capitalization and operating costs prorated equally. The pipeline will be owned by the participants in the West Cassia LLC on the basis of ownership. A formal agreement will be drafted and voted on by membership. Funding for the project

will be done by each owner as they are assessed by the operating entity. Company financing will be explored so the pipeline can be financed long term then a vote will be taken and upon agreement of the ownership the group can refinance the system.

5. All parties agree to furnish easements to the District at no cost to the district for these easements. The district will bear the cost of drafting and formalizing the legal documentation and easements. All property owners that provide easements through their property will be consulted and the easement area will be restored to the satisfaction of the land owner.

6. Upon permission from the water master a shareholder can switch water around with another shareholder with the individuals adjusting the costs between each other of these transactions. An accounting system and water management rules will be established and ratified by the landowners that participate.

7. Southwest and West Cassia plan to recharge the aquifer in the offseason and when water is not being used for irrigation. Any capital cost and maintenance incurred by a landowner furnishing a recharge site will be reimbursed by the West Cassia pipeline participants. Some reasonable compensation can be discussed for those providing recharge sites. Southwest will manage and administer all recharge issues.

8. If water rights are acquired by the West Cassia group they would be owned on a pro rata basis by their share of ownership in the pipeline leased to Southwest. If Southwest purchases the rights then they will own and administer them with all owners of the district sharing in the rights.

9. Each landowner initially will pay raise their own capital and submit all monies to the operating entity

Beck Farms	250
312-2781	
Cranney Farms	300
300-9260	
Wybenga Dairy	200
678-1713 (300-3227 Ryan Cranney)	
Skyline Dairy	250
Mike Bosma 539-1782	
John Beuker	300
280-1530	
Robinson Stoker	100
Brent 260-1990	
Wayne Anderson	200
312-3141	
Steve Hepworth	100
678-1669	
Ardema Dairy	400
260-6453	
Pickett Ranch	100
300-3401	
Russell Paterson	100
413-1111	
Ron Baker	100
300-3227	
Cranney Ranch	100
300-3227	
	2500

Southwest Irrigation District

Chairman
431-2856

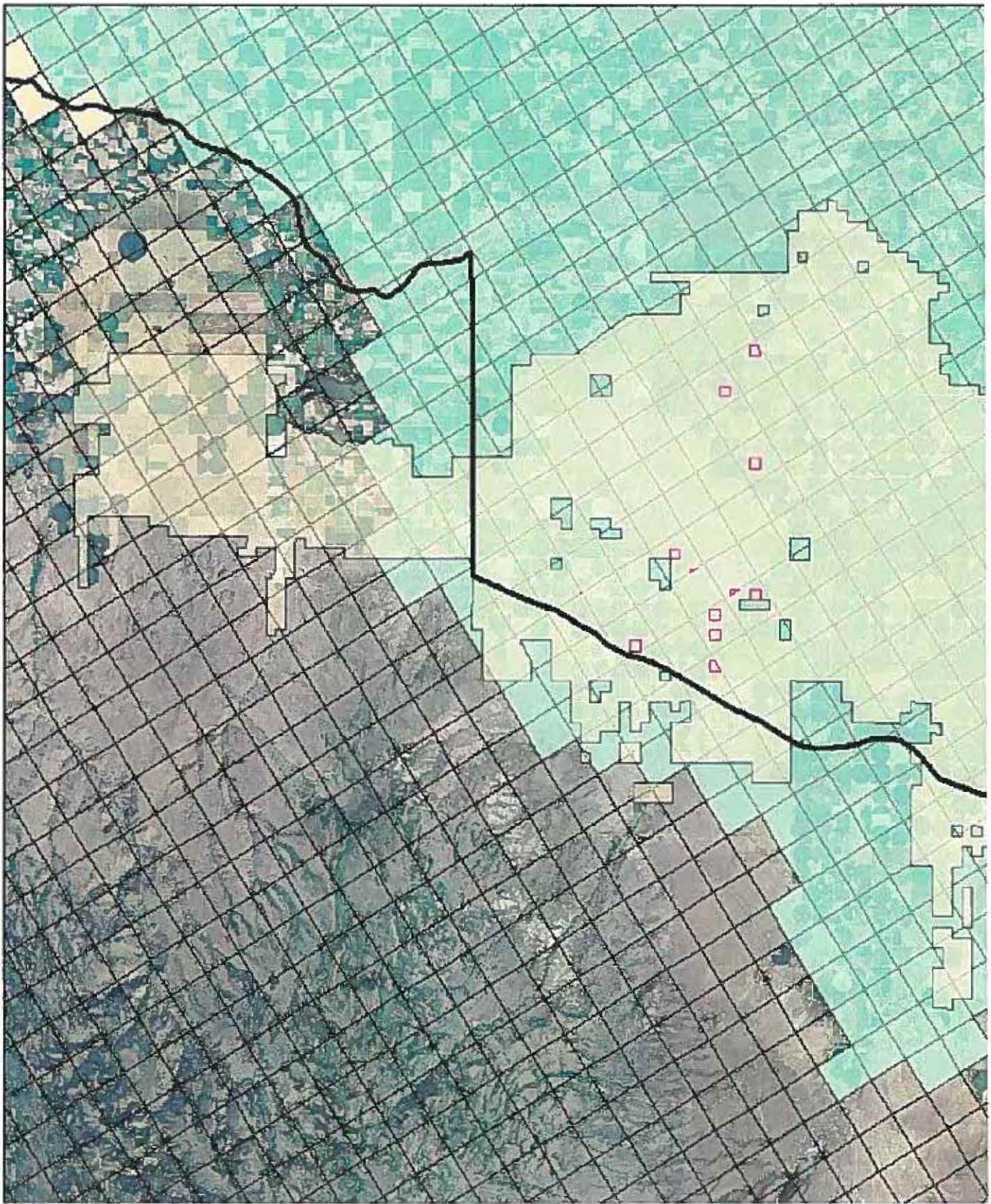
William A Parsons

From: "Wylie, Allan" <Allan.Wylie@idwr.idaho.gov>
To: <higgs@ida.net>
Sent: Friday, July 10, 2009 9:30 AM
Subject: Preliminary Southwest Model Run Results

Brian

I am sending you my preliminary results because some issues are arising and I don't know when I will be able to finalize my results and I don't want to slow you down. I still need to get my work checked and craft a format letter, but I don't anticipate any significant changes. You will note that rounding errors result in a 0.07% increase in water volume.

Name	POD	Replacement_AF	Recharge_AF	Avg_Impact_cf_d
Ardema	11s21e14sesw	2000	500	298356.164384
Alliance	11s21e12swsw	800	350	137243.835616
Baker	12s21e7sese	1200	350	184980.821918
Anderson	11s21e25nsw	1100	350	173046.575342
Beck	12s21e10swne	1400	450	220783.561644
Pickett	12s21e3swsw	800	350	137243.835616
Hepworth	12s21e21nwnw	800	300	131276.712329
Cranney	12s21e11swse	1800	600	286421.917808
Big Sky Dairy	12s21e14swnw	1000	400	167079.452055
Tribble Ace	12s21e14swsw	2000	600	310290.410959
Big Sky Dairy	12s21e12swsw	800	350	137243.835616
Wybenga Dairy	12s21e23nsw	1300	400	202882.191781



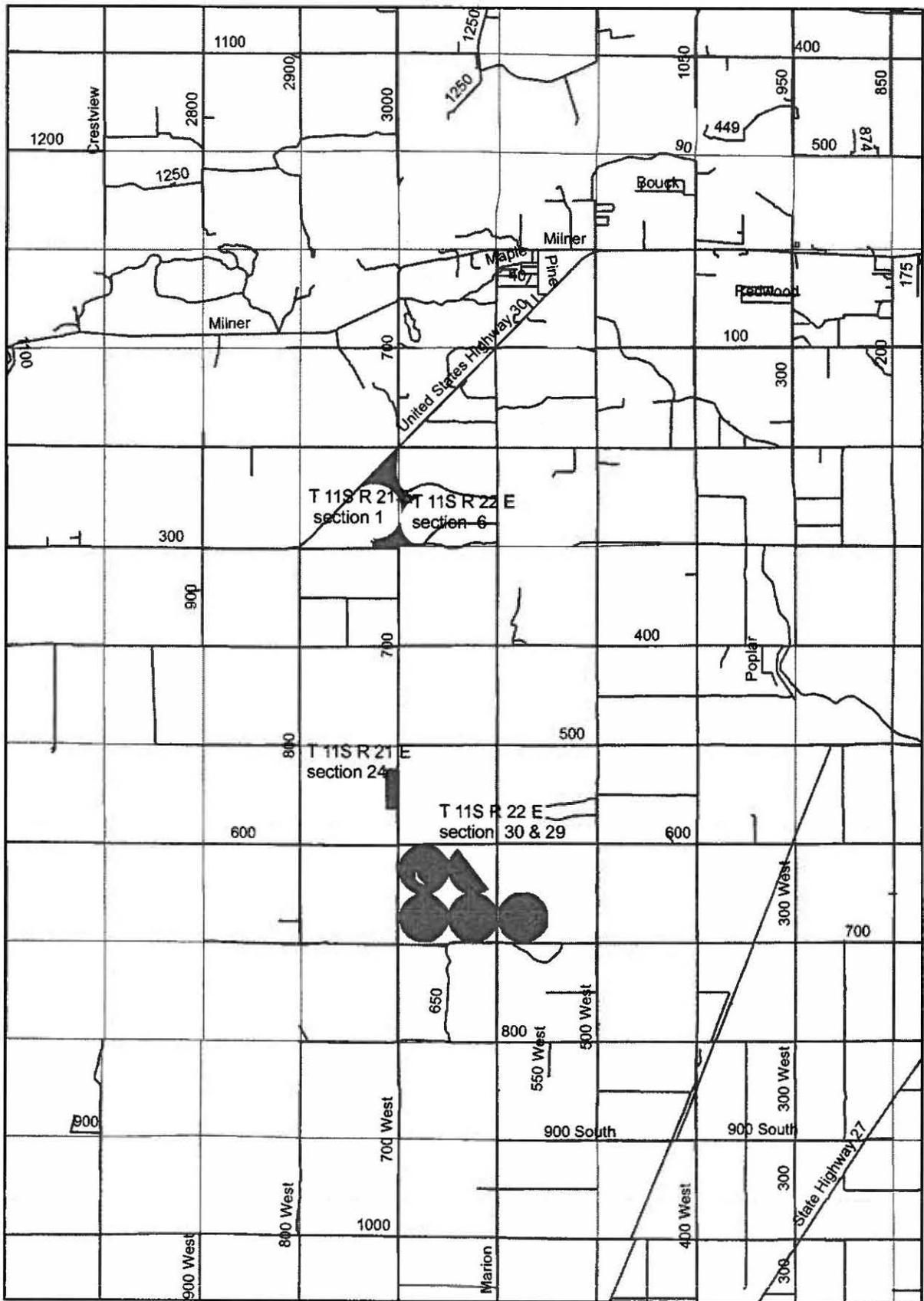
Modeled benefit

reach	cfs gain	ac-ft/y
Ashton-Rexburg	0.3	209
Heise-Shelley	0.3	240
Shelley-r Blackfoot	2.5	1,793
nr Blackfoot-Neeley	8.7	6,287

Neeley-Minidoka	3.8	2,753
Devils Wahsbowl-Buhl	6.8	4,915
Buhl-Thousand Spgs	2.3	1,684
Thousand Spgs	1.4	1,050
Thousand Spgs-Malad	0.2	113
Malad	1.3	934
Malad-Bancroft	0.0	36
sum	27.6	20,014

Allen Wylie
Idaho Department of Water Resources
322 East Front St
PO Box 83720
Boise, ID 83720-0098

Phone 208 287 4963
e-mail allan.wylie@idwr.idaho.gov



Owner	Acres	WRs	District
Hepworth Family Landholdings LLC	7.41	45-7330, 45-7117, 45-7032	SWID
Hepworth Family Landholdings LLC	3.54	45-7330, 45-7117, 45-7032	SWID
Hepworth Family Landholdings LLC	6.23	45-7330, 45-7117, 45-7032	SWID
Ore-Ida Foods Inc.	6.99	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc.	6.74	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc., Cranney Brothers	7.9	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	7.21	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	8.45	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	9.21	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc.	6.7	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc.	6.35	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc., Cranney Brothers	8.03	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	6.52	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc.	6.35	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc., Cranney Brothers	6.76	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc.	6.29	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc.	7.41	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc.	9.33	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc., Cranney Brothers	5.24	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	6.87	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	8.91	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	6.44	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13585	SWID
Ore-Ida Foods Inc.	8.06	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
Ore-Ida Foods Inc.	6.71	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
Ore-Ida Foods Inc., Cranney Brothers	8.21	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	8.28	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	7.39	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	7.88	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603, 45-13585	SWID
Ore-Ida Foods Inc., Cranney Brothers	6.41	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603	SWID
Ore-Ida Foods Inc., Cranney Brothers	5.77	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603	SWID
Ore-Ida Foods Inc., Cranney Brothers	0.65	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603	SWID
Ore-Ida Foods Inc., Cranney Brothers	0.44	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603	SWID
Ore-Ida Foods Inc., Cranney Brothers	0.48	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603	SWID
Ore-Ida Foods Inc., Cranney Brothers	0.85	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2603	SWID
Cranney Brothers	0.21	45-2603	SWID
Cranney Brothers	0.38	45-2603	SWID
Cranney Brothers	0.57	45-2603	SWID
Cranney Brothers	0.61	45-2603	SWID
Cranney Brothers	5.56	45-2603	SWID
Cranney Brothers	8.03	45-2603	SWID
Cranney Brothers	7.84	45-2603	SWID
Cranney Brothers	8.36	45-2603	SWID
Cranney Brothers	8	45-2603, 45-13585	SWID
Cranney Brothers	9.19	45-2603, 45-13585	SWID
Ore-Ida Foods Inc., Susan K Beck	6.07	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612, 45-13994, 45-2416	SWID

Ore-Ida Foods Inc., Susan K Beck	7.03	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612, 45-13994, 45-2416	SWID
Ore-Ida Foods Inc., Susan K Beck	6.46	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612, 45-13994	SWID
Ore-Ida Foods Inc., Susan K Beck	6.24	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612, 45-13994	SWID
Ore-Ida Foods Inc., Susan K Beck	6.28	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612, 45-13994	SWID
Ore-Ida Foods Inc.	5.75	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
Ore-Ida Foods Inc.	5.84	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
Ore-Ida Foods Inc.	5.79	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
Ore-Ida Foods Inc., Susan K Beck	5.66	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612, 45-13994	SWID
Russell Patterson	5.61	45-2582A, 45-13614, 45-13615, 45-11066, 45-13534, 45-2585A, 45-11092, 45-11042, 45-13536	SWID
Russell Patterson	4.59	45-2582A, 45-13614, 45-13615, 45-11066, 45-13534, 45-2585A, 45-11092, 45-11042, 45-13536	SWID
Susan K Beck, Golden Valley Mutual Water	4.37	45-2609, 45-13908, 45-13906	SWID
Ronald G Baker	5.37	45-7052	SWID
Ronald G Baker	5.92	45-7052	SWID
Ronald G Baker	4.79	45-7052	SWID
Ronald G Baker	5.67	45-7052	SWID
Ronald G Baker	6.88	45-7052	SWID
Ronald G Baker	5.26	45-7052	SWID
Ronald G Baker	5.3	45-7052	SWID
Ronald G Baker	6.34	45-7052	SWID
Cranney Ranches	4.6	45-7053, 45-13599	SWID
Cranney Ranches	5.72	45-7053, 45-13599	SWID
Cranney Ranches	0.45	45-7053, 45-13599	SWID
Cranney Ranches	0.89	45-7053, 45-13599	SWID
Cranney Ranches	0.48	45-7053, 45-13599	SWID
Cranney Ranches	1.15	45-7053, 45-13599	SWID
Cranney Ranches	5.16	45-7053, 45-13599	SWID
Cranney Ranches	6.24	45-7053, 45-13599	SWID
Cranney Ranches	4.38	45-7053, 45-13599	SWID
Cranney Ranches	5	45-7053, 45-13599	SWID
Cranney Ranches	4.9	45-7053, 45-13599	SWID
LDS Church (Corp of the Presiding Bishop)	6.73	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	9.18	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	3.96	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	12.43	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	4.96	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	3.61	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	4.99	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	5	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	4.54	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	5.14	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	4.96	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	4.74	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	5.05	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	7.45	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	3.76	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID
LDS Church (Corp of the Presiding Bishop)	6.18	45-2398, 45-4216A, 45-2400A, 45-2451, 45-2548, 45-2553, 45-2554, 45-4198, 45-2376C, 45-4215A	SWID

Waterstreet Farms	7.89	45-13491, 45-2595, 45-2586, 45-2680	SWID
Waterstreet Farms	8.55	45-13491, 45-2595, 45-2586, 45-2680	SWID
Waterstreet Farms	6.82	45-13491, 45-2595, 45-2586, 45-2680	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	7.63	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	8.31	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	6.95	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	7.46	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	10.25	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	9.65	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	7.13	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Wybenga Dairy LLC, Golden Valley Mutual V	6.78	45-71968, 45-73458, 45-13440, 45-13444, 45-13442, 45-13418, 45-2608A	SWID
Cranney Brothers	4.88	45-13551, 45-2567, 45-2668	SWID
Cranney Brothers	8.62	45-13551, 45-2567, 45-2668	SWID
Cranney Brothers	6.07	45-13551, 45-2567, 45-2668	SWID
Ore-Ida Foods Inc.	9.01	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13551, 45-2567, 45-2668	SWID
Ore-Ida Foods Inc.	10.6	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13551, 45-2567, 45-2668	SWID
Ore-Ida Foods Inc.	7.08	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-13551, 45-2567, 45-2668	SWID
Ore-Ida Foods Inc., Big Sky Dairy	7.99	45-2613,45-2629,45-2611,45-2614,45-2642,45-2620,45-2612,45-2394,45-7340A,45-2396,45-7258,45-7276	SWID
Ore-Ida Foods Inc., Big Sky Dairy	7.69	45-2613,45-2629,45-2611,45-2614,45-2642,45-2620,45-2612,45-2394,45-7340A,45-2396,45-7258,45-7276	SWID
Ore-Ida Foods Inc., Big Sky Dairy	6.37	45-2613,45-2629,45-2611,45-2614,45-2642,45-2620,45-2612,45-2394,45-7340A,45-2396,45-7258,45-7276	SWID
Big Sky Dairy	4.81	45-2394, 45-7340A, 45-2396, 45-7258, 45-7276	SWID
Big Sky Dairy	4.33	45-2394, 45-7340A, 45-2396, 45-7258, 45-7276	SWID
Ore-Ida Foods Inc.	7	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ore-Ida Foods Inc.	6.52	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	SWID
Ruth Beukers	6.4	45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers	5.79	45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers	5.51	45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers	5.21	45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers	5.7	45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers	7.72	45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers	7.51	45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	7.15	45-2608A, 45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	7.02	45-2608A, 45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	5.51	45-2608A, 45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	5.21	45-2608A, 45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	5.86	45-2608A, 45-7086D, 45-2578, 45-2597	SWID
Ruth Beukers	8.05	45-2608B	SWID
Ruth Beukers	7.16	45-2608B	SWID
Russell Patterson	5.5	45-2582A, 45-2585A, 45-11042	SWID
Ruth Beukers, Golden Valley Mutual Water	6.79	45-2610, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	6.56	45-2610, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	5.54	45-2610, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	5.3	45-2610, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	6.6	45-2610, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers	6.53	45-2578, 45-14060, 45-2597	SWID
Ruth Beukers	6.18	45-2578, 45-14060, 45-2597	SWID

Ruth Beukers	5.95	45-2578, 45-14060, 45-2597	SWID
Ruth Beukers	5.9	45-2578, 45-14060, 45-2597	SWID
Ruth Beukers	6.83	45-2578, 45-14060, 45-2597	SWID
Ruth Beukers	6.78	45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	6.05	45-2649, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	6.86	45-2649, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	6.45	45-2649, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers, Golden Valley Mutual Water	6.01	45-2649, 45-2578, 45-14060, 45-2597	SWID
Ruth Beukers	5.89	45-2578, 45-14060, 45-2597	SWID
Russell Patterson	5.54	45-2582A, 45-2585A, 45-11042	SWID
Ruth Beukers	5.16	45-13627, 45-14060	SWID
Ruth Beukers	6.32	45-13627, 45-14060	SWID
Ruth Beukers	6.49	45-13628, 45-14060	SWID
Ruth Beukers	4.97	45-13628, 45-14060	SWID
Ruth Beukers	5.22	45-13628, 45-14060	SWID
Ruth Beukers	6.26	45-13628, 45-14060	SWID
Ruth Beukers	5.84	45-13628, 45-14060	SWID
Ruth Beukers	5.37	45-13628, 45-14060	SWID
Ruth Beukers	5.76	45-13628, 45-14060	SWID
Double Eagle Inc.	6.75	45-7478	SWID
Double Eagle Inc.	6.14	45-7478	SWID
Double Eagle Inc.	5.91	45-7478	SWID
Double Eagle Inc.	5.64	45-7478	SWID
Double Eagle Inc.	6.07	45-7478	SWID
Double Eagle Inc.	5.82	45-7478	SWID
Double Eagle Inc.	6.69	45-7478	SWID
Double Eagle Inc.	6.3	45-7478	SWID
Double Eagle Inc.	5.73	45-7478	SWID
Double Eagle Inc.	6.38	45-7478	SWID
Double Eagle Inc.	6.02	45-7478	SWID
Double Eagle Inc.	5.26	45-7478	SWID
Double Eagle Inc.	4.87	45-7478	SWID
Double Eagle Inc.	5.48	45-7478	SWID
Double Eagle Inc.	5.78	45-7478	SWID
Double Eagle Inc.	5.74	45-7478	SWID
Double Eagle Inc.	5.76	45-7478	SWID
Double Eagle Inc.	5.71	45-7478	SWID
Double Eagle Inc.	5.58	45-7478	SWID
J. R. Simplot Co.	6.05	45-2746	SWID
J. R. Simplot Co.	5.86	45-2746	SWID
J. R. Simplot Co.	5.64	45-2746	SWID
Grant M. Wyatt	5.38	45-13541, 45-4018	SWID
Alliance Land & Livestock LLC	5.63	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	5.93	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	6.69	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	7.55	45-13518, 45-13520, 45-13516	SWID

Alliance Land & Livestock LLC	7.18	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	6.32	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	5.39	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	4.8	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	6.12	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	7.41	45-13518, 45-13520, 45-13516	SWID
Alliance Land & Livestock LLC	8.16	45-2682	SWID
Alliance Land & Livestock LLC	7.31	45-2682	SWID
Alliance Land & Livestock LLC	4.63	45-2682	SWID
Alliance Land & Livestock LLC	6.89	45-2682	SWID
Alliance Land & Livestock LLC	7.62	45-2682	SWID
Alliance Land & Livestock LLC	8.18	45-2682	SWID
Karla Ward	6.37	45-13521, 45-2469	SWID
Alliance Land & Livestock LLC	7.56	45-2682	SWID
Alliance Land & Livestock LLC	6.5	45-2682	SWID
Alliance Land & Livestock LLC	6.99	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	6.48	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	5.9	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	6.62	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Schenk Land & Cattle LP	4.01	45-12450, 45-4013B	SWID
J. Allen Woodhouse	4.47	45-14176	SWID
Alliance Land & Livestock LLC	7.97	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	7.41	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	8.26	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	10.42	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	12.29	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	11.58	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	9.47	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
Alliance Land & Livestock LLC	5.81	45-7482A, 45-12769A, 45-14054, 45-2674B, 45-7482B, 45-14104	SWID
LDS Church (Corp of the Presiding Bishop)	6.12	45-10789, 45-2538	SWID
J. R. Simplot, Sadie M. Breeding	4.63	45-2746, 45-13643	SWID
J. R. Simplot, Sadie M. Breeding	4.1	45-2746, 45-13643	SWID
Patricia M. Funk	6.19	45-13910	SWID
Patricia M. Funk	6.38	45-13910	SWID
Patricia M. Funk	6.67	45-13910	SWID
Ore-Ida Foods Inc.	5.58	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
Ore-Ida Foods Inc.	5.35	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
Ore-Ida Foods Inc.	5.86	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612	SWID
United States of America Acting Through US	5.01	45-13786	SWID
Ore-Ida Foods Inc., Susan K. Beck	4.89	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-2612, 45-13994, 45-2516	SWID
Russell Patterson	1.33	45-2582A, 45-2585A, 45-11042	SWID
Hepworth Family LTD Partnership	6.1	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership, Ronald H	5.44	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC
Hepworth Family LTD Partnership	5.89	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership, Ronald H	5.05	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC
Hepworth Family LTD Partnership, Ronald H	5.03	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC

Hepworth Family LTD Partnership	5.5	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership, Ronald H	6.65	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC
Hepworth Family LTD Partnership, Ronald H	5.57	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC
Hepworth Family LTD Partnership	5.52	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership, Ronald H	5.48	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC
Hepworth Family LTD Partnership, Ronald H	6.17	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC
Hepworth Family LTD Partnership	6.55	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership, Ronald H	4.75	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243, 45-2628	GC
Hepworth Family LTD Partnership	5.97	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
LCSC Enterprises LLC	2.19	45-7277, 45-7189	GC
LCSC Enterprises LLC	1.5	45-7277, 45-7189	GC
LCSC Enterprises LLC	2.41	45-7277, 45-7189	GC
LCSC Enterprises LLC	4.06	45-7277, 45-7189	GC
LCSC Enterprises LLC	6.49	45-7277, 45-7189	GC
LCSC Enterprises LLC	5.43	45-7277, 45-7189	GC
LCSC Enterprises LLC	5.82	45-7277, 45-7189	GC
Big Sky Dairy	5.79	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	5.74	45-7355, 45-7335, 45-13549	GC
Ore-Ida Foods Inc.	6.23	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-7355, 45-7335, 45-13549	GC
Ore-Ida Foods Inc.	8.69	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-7355, 45-7335, 45-13549	GC
United States of America Acting Through US	6.67	45-73408	GC
Cranney Brothers	5.95	45-2413,45-2431,45-25948,45-4045,45-7242,45-7307,45-13550,45-2432,45-4107,45-7064,45-7055,45-7150	GC
Cranney Brothers	6.69	45-2413,45-2431,45-25948,45-4045,45-7242,45-7307,45-13550,45-2432,45-4107,45-7064,45-7055,45-7150	GC
Cranney Brothers	6.66	45-2413,45-2431,45-25948,45-4045,45-7242,45-7307,45-13550,45-2432,45-4107,45-7064,45-7055,45-7150	GC
Cranney Brothers	3.21	45-2413,45-2431,45-25948,45-4045,45-7242,45-7307,45-13550,45-2432,45-4107,45-7064,45-7055,45-7150	GC
Cranney Brothers	6.42	45-2413,45-2431,45-25948,45-4045,45-7242,45-7307,45-13550,45-2432,45-4107,45-7064,45-7055,45-7150	GC
Whiteley Brothers LLC	5.91	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	5.59	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	7.13	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	7.23	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	7.19	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	4.87	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	7.28	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	6.23	45-10414, 45-2263, 45-2656, 45-2547	GC
Whiteley Brothers LLC	6.98	45-10414, 45-2263, 45-2656, 45-2547	GC
Ore-Ida Foods Inc.	6.85	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	GC
Ore-Ida Foods Inc.	6.73	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	GC
Ore-Ida Foods Inc.	7.94	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	GC
Ore-Ida Foods Inc.	7.36	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620	GC
Ore-Ida Foods Inc., Big Sky Dairy	5.99	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-7355, 45-7335, 45-13549	GC
Ore-Ida Foods Inc., Big Sky Dairy	6.08	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-7355, 45-7335, 45-13549	GC
Ore-Ida Foods Inc., Big Sky Dairy	5.64	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-7355, 45-7335, 45-13549	GC
Ore-Ida Foods Inc., Big Sky Dairy	5.7	45-2613, 45-2629, 45-2611, 45-2614, 45-2642, 45-2620, 45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	6.17	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	3.39	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	4.76	45-7355, 45-7335, 45-13549	GC

Big Sky Dairy	4.02	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	5.87	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	6.25	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	6.48	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	5.6	45-7355, 45-7335, 45-13549	GC
Big Sky Dairy	6.82	45-7355, 45-7335, 45-13549	GC
Hepworth Family LTD Partnership	3.28	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership	6.1	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership	5.49	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership	6.41	45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership, Ronald H	6.75	45-2556, 45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
Hepworth Family LTD Partnership, Ronald H	5.66	45-2556, 45-14237, 45-14239, 45-14241, 45-14235, 45-14245, 45-14243	GC
LCSC Enterprises LLC	6.63	45-7277, 45-7189	GC
LCSC Enterprises LLC	6.87	45-7277, 45-7189	GC

Non-members covered by SWID Mitigation

Name	WR #	CFS	Acres
City of Burley	36-8154	1.2	Industrial
	45-13411	7.8	
	45-7269	3.56	
	45-7436	0.69	
	45-7686	1.75	
	45-7735	4.46	
Ranae Eddings	45-7615	0.07	
Josef Ehrler	45-7377	0.15	5
First Presbyterian Church	45-7529	0.03	1
Farmland Reserve	45-7363	1.66	139
	45-7374	3.1	155
Jim Gochmour	45-7461	0.73	36.5
	45-7510	1.19	90
	45-7277	1.11	101
Springdale Acres	45-13513	non-consumptive heating/cooling	
	45-7375	0.12	domestic
	45-7697	0.31	
Craig Searle	45-13946	0.35	stock
Tessengerlo Kerley	45-7465B	0.14	9
	45-7465C	0.14	9