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RECEIVED  
MAR 03 2014  
DEPARTMENT OF  
WATER RESOURCES

*Attorneys for Rangen, Inc.*

BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO

IN THE MATTER OF THE MITIGATION  
PLAN FILED BY THE IDAHO GROUND  
WATER APPROPRIATORS FOR THE  
DISTRIBUTION OF WATER TO WATER  
RIGHT NOS. 36-02551 AND 36-07694 IN  
THE NAME OF RANGEN, INC.

Docket No. CM-MP-2014-001

**I.R.C.P. 30(b)(6) NOTICE OF  
TAKING DEPOSITION DUCES  
TECUM OF NORTH SNAKE  
GROUNDWATER DISTRICT**

**Tuesday, March 4, 2014  
1:30 p.m.**

**May, Browning & May, PLLC  
516 Hansen Street East  
Twin Falls, ID 83301**

**TO: THE NORTH SNAKE GROUNDWATER DISTRICT and its attorneys of record:**

PLEASE TAKE NOTICE that Rangen, Inc., will take the deposition of the North Snake Groundwater District before a certified Court Reporter, in accordance with the Rules of Civil Procedure of the State of Idaho, on the 4<sup>th</sup> day of March, 2014, at the hour of 1:30 p.m. at the Offices of May, Browning & May, PLLC, 516 Hansen Street East, Twin Falls, ID 83301.

**I.R.C.P. 30(b)(6) NOTICE OF DEPOSITION DUCES TECUM OF NORTH SNAKE  
GROUNDWATER DISTRICT - 1**

Pursuant to I.R.C.P. 30(b)(6), the Deponent is required to designate one or more officers, directors, managing agents or other person(s) who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify, regarding the topics set forth below:

- Mitigation Plan filed by IGWA in the above-captioned matter
- The Sandy Pipeline
- Delivery of water to Butch Morris and/or other water users through the Sandy Pipeline

The Deponent is further required to identify and bring with him the following documents:

1. Copies of all mitigation plans submitted by, or on behalf of Northsnake

Groundwater District, which have been approved by IDWR.

2. Copies of maps, diagrams, photographs, drawings showing Sandy Ponds and Sandy Pipeline.

3. Copies of all agreements or other documents which pertain to the construction of the Sandy Ponds and Sandy Pipeline.

4. Copies of all agreements or other documents which pertain to the operation and use of the Sandy Ponds and Sandy Pipeline.

5. Copies of all documents which pertain to the purchase of water delivered through the Sandy Pipeline.

6. Copies of all documents which pertain to the ownership of the Sandy Ponds and Sandy Pipeline.

7. Copies of all documents which pertain to who is authorized to divert water from the Sandy Pipeline.

8. Copies of all agreements or other documents which authorize the use of water from the Sandy Pipeline. This includes, but is not limited to, agreements between Northside Canal Company and/or North Snake Groundwater District, and/or Howard "Butch" Morris.

9. Copies of all documents which reflect the amount of water that has been delivered to the Sandy Pipeline since it became operational.

10. Copies of all documents which reflect the amount of water delivered to the Sandy Ponds since they became operational.

11. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by Howard "Butch" Morris since the Sandy Pipeline became operational.

12. Copies of all documents which reflect the amount of water that has been diverted from the Martin-Curren Tunnel by Howard "Butch" Morris.

13. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by J. and/or Tim Musser since the Sandy Pipeline became operational.

14. Copies of all documents which reflect the amount of water that has been diverted from the Martin-Curren Tunnel for use by J. Musser, T. Musser or their heirs.

15. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by Walter and/or Margaret Candy.

16. Copies of all documents which reflect the amount of water that has been diverted from the Martin-Curren Tunnel for use by Walter and/or Margaret Candy.

17. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by any other water user not identified herein.

17. Any and all documents, books, papers, recordings, electronic data, emails, communications, photographs, or other documents or items reviewed in preparation for this Rule 30(b)(6) deposition.

The term "document" as used above includes, but is not limited to, notes (oral or written), memoranda, reports, studies, maps, surveys, plans, drawings, photographs, calculations, spreadsheets and any computer analyses, whether written or electronic in format.

All parties and their counsel are invited to attend. The oral examination will continue from day to day until completed.

DATED this 3 day of March, 2014.

MAY, BROWNING & MAY, PLLC

By   
 J. Justin May

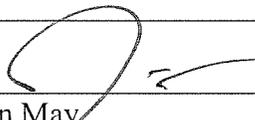
**CERTIFICATE OF SERVICE**

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the \_\_\_ day of March, 2014, I caused a true and correct copy of the foregoing document to be served using the method indicated upon the following:

<p><b>Original:</b>          Director Gary Spackman          Idaho Department of Water          Resources          P.O. Box 83720          Boise, ID 83720-0098          Deborah.Gibson@idwr.idaho.gov</p>	<p>Hand Delivery <input checked="" type="checkbox"/>          U.S. Mail <input type="checkbox"/>          Facsimile <input type="checkbox"/>          Federal Express <input type="checkbox"/>          E-Mail <input checked="" type="checkbox"/></p>
<p>Garrick Baxter          Chris Bromley          Idaho Department of Water          Resources          P.O. Box 83720          Boise, Idaho 83720-0098          garrick.baxter@idwr.idaho.gov          chris.bromley@idwr.idaho.gov</p>	<p>Hand Delivery <input checked="" type="checkbox"/>          U.S. Mail <input type="checkbox"/>          Facsimile <input type="checkbox"/>          Federal Express <input type="checkbox"/>          E-Mail <input checked="" type="checkbox"/></p>

<p>Randall C. Budge  Candice M. McHugh  Thomas J. Budge  RACINE, OLSON, NYE, BUDGE  &amp; BAILEY, CHARTERED  P.O. Box 1391  101 South Capitol Blvd, Ste 300  Boise, ID 83704-1391  Fax: 208-433-0167  rcb@racinelaw.net  cmm@racinelaw.net  tjb@racinelaw.net</p>	<p>Hand Delivery <input type="checkbox"/>  U.S. Mail <input type="checkbox"/>  Facsimile <input type="checkbox"/>  Federal Express <input type="checkbox"/>  E-Mail <input checked="" type="checkbox"/></p>
<p>Sarah Klahn  Mitra Pemberton  WHITE &amp; JANKOWSKI  Kittredge Building,  511 16th Street, Suite 500  Denver, CO 80202  sarahk@white-jankowski.com  mitrap@white-jankowski.com</p>	<p>Hand Delivery <input type="checkbox"/>  U.S. Mail <input type="checkbox"/>  Facsimile <input type="checkbox"/>  Federal Express <input type="checkbox"/>  E-Mail <input checked="" type="checkbox"/></p>
<p>Dean Tranmer  City of Pocatello  P.O. Box 4169  Pocatello, ID 83201  dtranmer@pocatello.us</p>	<p>Hand Delivery <input type="checkbox"/>  U.S. Mail <input type="checkbox"/>  Facsimile <input type="checkbox"/>  Federal Express <input type="checkbox"/>  E-Mail <input checked="" type="checkbox"/></p>
<p>John K. Simpson  Travis L. Thompson  Paul L. Arrington  Barker Rosholt &amp; Simpson, L.L.P.  195 River Vista Place, Suite 204  Twin Falls, ID 83301-3029  Facsimile: (208) 735-2444  tlt@idahowaters.com  jks@idahowaters.com</p>	<p>Hand Delivery <input type="checkbox"/>  U.S. Mail <input type="checkbox"/>  Facsimile <input type="checkbox"/>  Federal Express <input type="checkbox"/>  E-Mail <input checked="" type="checkbox"/></p>
<p>C. Thomas Arkoosh  ARKOOSH LAW OFFICES  802 West Bannock, Suite 900  Boise, ID 83701  tom.arkoosh@arkoosh.com</p>	<p>Hand Delivery <input type="checkbox"/>  U.S. Mail <input type="checkbox"/>  Facsimile <input type="checkbox"/>  Federal Express <input type="checkbox"/>  E-Mail <input checked="" type="checkbox"/></p>
<p>W. Kent Fletcher  Fletcher Law Office  P.O. Box 248  Burley, ID 83318  wkf@pmt.org</p>	<p>Hand Delivery <input type="checkbox"/>  U.S. Mail <input type="checkbox"/>  Facsimile <input type="checkbox"/>  Federal Express <input type="checkbox"/>  E-Mail <input checked="" type="checkbox"/></p>

Jerry R. Rigby Hyrum Erickson Robert H. Wood Rigby, Andrus & Rigby, Chartered 25 North Second East Rexburg, ID 83440 jrigby@rex-law.com herickson@rex-law.com rwood@rex-law.com	Hand Delivery <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Federal Express <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/>
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J. Justin May