

BRODY

LAW OFFICE, PLLC



May 6, 2014
Sent via email

Garrick Baxter
Idaho Department of Water Resources
PO Box 83720
Boise, ID 83720

Re: Request for Information

Dear Garrick:

We would appreciate receiving copies of the following documents:

- A list of all IDWR employees and contractors who have participated in any discussions or meetings or done any work on a plan to use Tucker Springs Water Rights to mitigate Rangen's delivery call.
- All documents evidencing water rights owned by the State of Idaho or any of its governmental agencies or subdivisions (e.g., Department of Fish and Game) which have Tucker Springs as the source ("Tucker Springs Water Rights").
- All water measurements for the Tucker Springs Water Rights.
- All maps, diagrams, drawings and photographs of Tucker Springs, including, but not limited to all diversion structures which divert water for the Tucker Springs Water Rights.
- All engineering plans, blueprints, diagrams, and sketches pertaining to the use of Tucker Springs Water Rights to mitigate Rangen's delivery call.
- All documents pertaining to the acquisition of easements or rights of way from third parties for purposes of using Tucker Springs Water Rights to mitigate Rangen's delivery call.
- All documents pertaining to downstream users who may be injured by the use of Tucker Springs Water Rights to mitigate Rangen's delivery call including, but not limited to any documents evidencing any plans to address the downstream users' injuries.

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- All other documents pertaining to the use of Tucker Springs Water Rights to mitigate Rangen's delivery call. Rangen is not requesting copies of the documents that IGWA has filed in CM-MP-2014-003 or CM-MP-2014-001.
- All correspondence and communications, including all emails and notes of conversations, between IDWR and Idaho Department of Fish & Game, Idaho Department of Fish and Game Board of Commissioners or individual Commissioners concerning Tucker Springs Water Rights or the use of those water rights to mitigate Rangen's delivery call.
- All correspondence and communications, including all emails and notes of conversations, between IDWR and Idaho Department of Fish & Game concerning the use of Tucker Springs Water Rights for mitigation of Rangen's delivery call.
- All correspondence and communications, including all emails and notes of conversations, between IDWR and any other persons or entities concerning the use of Tucker Springs Water Rights for mitigation for Rangen, Inc.'s delivery call. The includes, but is not limited to, correspondence and communications with IGWA, SPF Water Engineering, LLC, Randy Budge, TJ Budge, Candice McHugh, Chris Bromley, the Idaho Water Resource Board, any other State of Idaho agencies or political subdivisions (e.g., Department of Environmental Quality), and Speaker of the House of Representatives Scott Bedke or any member of Speaker Bedke's staff.
- Notes of all meetings held by IDWR or attended by IDWR staff or contractors concerning the use of Tucker Springs Water Rights for mitigation of Rangen, Inc.'s delivery call.

Thank you for your assistance.

Very truly yours,

BRODY LAW OFFICE, PLLC

By: 

Robyn M. Brody

cc: Randy Budge
TJ Budge
John Simpson
Travis Thompson
Paul Arrington
Timothy J. Stover
Michael J. Henslee
Leo E. Ray
Almer Huntley