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Attorneys for Defendants

**IN THE DISTRICT COURT OF THE SIXTH JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF POWER**

ABERDEEN-SPRINGFIELD CANAL  
COMPANY, an Idaho Corporation, JEFFREY  
and CHANA DUFFIN, individually, as  
stockholders, and as husband and wife,

Plaintiffs,

vs.

IDAHO DEPARTMENT OF WATER  
RESOURCES, an executive department of the  
State of Idaho,

Defendant,

and

A&B IRRIGATION DISTRICT, AMERICAN  
FALLS RESERVOIR DISTRICT #2,

**Case No. CV-2014-165**

**IDWR DISCLOSURE OF LAY  
AND EXPERT WITNESSES**

BURLEY IRRIGATION DISTRICT,  
MINIDOKA IRRIGATION DISTRICT,  
MILNER IRRIGATION DISTRICT, NORTH  
SIDE CANAL COMPANY AND TWIN  
FALLS CANAL COMPANY,

Defendant-Intervenors.

COMES NOW, Defendant Idaho Department of Water Resources (“IDWR”), pursuant to the Court’s August 12, 2014 *Stipulation for Scheduling and Planning*, and identifies the following lay and expert witnesses:

A. Lay Witnesses: IDWR will not call any lay witnesses.

B. Expert Witnesses:

1. Chad Hersley  
IDWR Technical Hydrogeologist  
322 E. Front St.  
P.O. Box 83720  
Boise, ID 83720-0098

Mr. Hersley is a licensed professional geologist. He has been employed by IDWR as a Technical Hydrogeologist since 2007. At IDWR Mr. Hersley administers Idaho’s driller licensing program and works with drilling contractors and well owners to ensure wells are constructed to comply with Idaho well construction standards. Additionally, Mr. Hersley administers the geothermal resources permitting program. Prior to his tenure at IDWR, Mr. Hersley spent 17 years at the Idaho National Laboratories where he worked in well drilling and construction, aquifer characterization, and remediation projects. He has one publication within the past 10 years: Rodgers, D.W., Long, S.P., McQuarrie, N., Hersley, C.F., and Burgel, W.D., 2006, Geologic Map of the Inkom Quadrangle, Bannock County, Idaho: Idaho Geological Survey Technical Report 06-2, scale 1:24,000, (two sheets), 2006. He has not testified as an

expert witness in the past four years. Mr. Hersley will not receive any compensation beyond his salary with IDWR.

Mr. Hersley will testify as to the hydrogeology of the area surrounding Aberdeen-Springfield Canal Company's ("ASCC") service area, well construction, and the nature of the wells mentioned in ASCC's complaint. Mr. Hersley will base his testimony on ASCC's discovery disclosures, IDWR's well construction database, his knowledge of the area in question and his expertise in well construction. During his testimony, Mr. Hersley will present diagrams of the hydrogeology of the area.

2. James Cefalo  
IDWR Water Resource Program Manager and Water Master  
900 N Skyline Drive, Suite A  
Idaho Falls, ID 83402-1718

Mr. Cefalo holds a bachelor's degree in Civil and Environmental Engineering. He has been employed with IDWR since 2007 and has been the Water Resource Program Manager for IDWR's Eastern Region since 2010. In that position he is responsible for overseeing work with transfers, licenses, and permits. He also is a Hearing Officer Coordinator in which he hears contested cases before IDWR that do not need to be heard by the Director. In addition, Mr. Cefalo has been the Water Master for Water Districts 100, 110, and 120 since 2010. His duties as Water Master include taking ground water diversion measurements, conduct field investigations, and administer water rights. Mr. Cefalo has no publications and has not testified as an expert in the past four years. He will not receive any compensation for testifying beyond his salary with IDWR. Mr. Cefalo will testify about ground water use in Water District 120. He will base his testimony on his work experience in his three roles with IDWR.

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DATED this 14<sup>th</sup> day of January 2015.

LAWRENCE G. WASDEN  
Attorney General

CLIVE J. STRONG  
Chief, Natural Resources Division

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

JOHN HOMAN  
GARRICK L. BAXTER  
MEGHAN CARTER  
Deputy Attorneys General  
Idaho Department of Water Resources

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 14<sup>th</sup> day of January 2015, I caused a true and correct copy of the foregoing document to be filed with the Court and served on the following parties by the indicated methods:

Original to:  
Clerk of the Court  
Snake River Basin Adjudication  
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