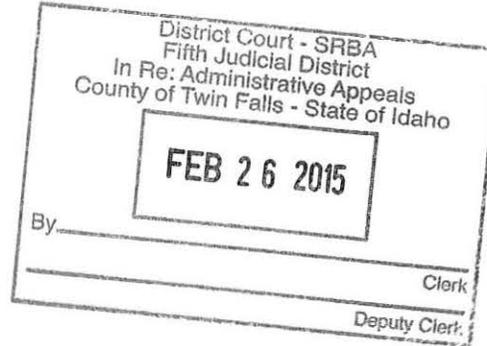


COPY

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12 Attorneys for Petitioner, Rangen, Inc.

13
14 **IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE**
15 **STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

16 RANGEN, INC., an Idaho Corporation,

) Case No. CV-2014-4633

17 Petitioner,

) RANGEN, INC.'S AMENDED MOTION
) TO AUGMENT RECORD

18 vs.

19 IDAHO DEPARTMENT OF WATER
20 RESOURCES and Gary Spackman, in his
21 official capacity as Director of the Idaho
22 Department of Water Resources,

23 Respondent.

24 COMES NOW the Petitioner, RANGEN, INC. by and through its attorneys of record, and
25 pursuant to I.R.C.P. 84(1) and the Court's Procedural Order Governing Judicial Review of Final
Order of Director of Idaho Department of Water Resources dated December 5, 2014 and hereby

1 moves the Court to enter an Order requiring the Idaho Department of Water Resources to augment
2 the record of this matter with the following items:

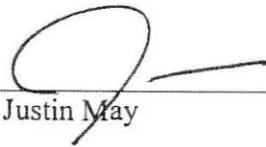
- 3 • All record items filed in Rangen's Petition for Delivery Call, CM-DC-2011-004 on the
4 list attached hereto as Exhibit 1

5 Rangen has consulted with the Idaho Department of Water Resources, the Idaho Ground Water
6 Appropriators, Inc. and Kathleen McKenzie concerning this Amended Motion to Augment. IDWR
7 and Ms. McKenzie do not object to this Amended Motion to Augment Record. IGWA objects to
8 the Amended Motion, but does not object to the original Motion to Augment Record.

9 WHEREFORE, Rangen respectfully requests that this Amended Motion to Augment Record
10 be granted.

11 DATED this 26th day of February, 2015.

12 MAY BROWNING & MAY, P.L.L.C.

13
14
15 By: 

16 J. Justin May
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CERTIFICATE OF SERVICE

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the 26th day of February, 2015 he caused a true and correct copy of the foregoing document to be served upon the following as indicated:

<p>Original: State of Idaho SRBA District Court 253 3rd Ave. North P.O. Box 2707 Twin Falls, ID 83303-2707 Facsimile: (208) 736-2121</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 Idaho Department of Water Resources P.O. Box 83720 Boise, Idaho 83720-0098 garrick.baxter@idwr.idaho.gov emmi.blades@idwr.idaho.gov kimi.white@idwr.idaho.gov</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>Randall C. Budge TJ Budge RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED 201 E. Center Street P.O. Box 1391 Pocatello, ID 83204 rcb@racinelaw.net tjb@racinelaw.net bjh@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>William A. Parsons 137 W. 13th St. P.O. Box 910 Burley, ID 83318 wparsons@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>
<p>Kathy McKenzie P.O. Box 109 Hagerman, ID 83332 knbmac@q.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>



 J. Justin May

EXHIBIT 1 – AMENDED MOTION TO AUGMENT RECORD

Notice of Acceptance of Delivery of Water Under IGWA's Second Mitigation Plan – July 8, 2014

Order Approving IGWA's Second Mitigation Plan; Order Lifting Stay Issued April 28, 2014; Second Amended Curtailment Order – June 20, 2014

Final Order on Reconsideration – May 16, 2014

Amended Order Approving in Part and Rejecting in Part IGWA's Mitigation Plan; Order Lifting Stay Issued February 21, 2014; Amended Curtailment Order – May 16, 2014

Order Granting IGWA's Second Petition to Stay Curtailment – April 28, 2014

IGWA's Petition for Reconsideration and Clarification – April 25, 2014

Rangen's Motion for Reconsideration of Order Re: IGWA's Mitigation Plan; Order Lifting Stay; Amended Curtailment Order – April 25, 2014

Rangen, Inc.'s Response in Opposition to IGWA's Second Petition to Stay Curtailment – April 25, 2014

IGWA's Reply in Support of its Second Petition to Stay Curtailment – April 25, 2014

Letter from Howard "Butch" Morris Agreeing to Cease Diverting 0.3 CFS from Curren Tunnel Through His Irrigation Pipeline – April 23, 2014

IGWA's Second Petition to Stay Curtailment, and Request for Expedited Decision – April 17, 2014

Supporting Data – April 11, 2014

Attachment A – April 11, 2014

Order Approving in Part and Rejecting in Part IGWA's Mitigation Plan; Order Lifting Stay Issued February 21, 2014; Amended Curtailment Order – April 11, 2014

Order on Reconsideration – March 4, 2014

IGWA's Reply Brief in Support of its Petition for Reconsideration – February 27, 2014

City of Pocatello's Response to Rangen, Inc.'s Petition for Reconsideration and Clarification – February 26, 2014

Rangen, Inc.'s Memorandum in Opposition to IGWA's Petition for Reconsideration – February 26, 2014

Water Coalition's Response to IGWA's Petition for Reconsideration – February 25, 2014

IGWA's Response to Rangen's Petition for Reconsideration and Clarification – February 24, 2014

Order Granting IGWA's Petition to Stay Curtailment – February 21, 2014

Affidavit of J. Justin May in Opposition to the Idaho Cities' Petition for Limited Intervention and in Opposition to IGWA's Petition to Stay Curtailment – February 19, 2014

Rangen, Inc.'s Response in Opposition to IGWA's Petition to Stay Curtailment – February 19, 2014

Order Shortening Time to File Responses to IGWA's Petition to Stay Curtailment – February 12, 2014

City of Pocatello's Motion to Reconsider – February 12, 2014

Rangen, Inc.'s Motion for Reconsideration and Clarification – February 12, 2014

IGWA's Petition to Stay Curtailment and Request for Expedited Decision – February 12, 2014

IGWA's Mitigation Plan and Request for Hearing – February 11, 2014

IGWA's Petition for Reconsideration – February 11, 2014

Final Order Regarding Rangen, Inc.'s Petition for Delivery Call; Curtailing Ground Water Rights Junior to July 13, 1962 – January 29, 2014