

DEC 10 2013

DEPARTMENT OF  
WATER RESOURCES

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*Attorneys for Aberdeen-Springfield Canal Company*

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**BEFORE THE DEPARTMENT OF WATER RESOURCES  
 OF THE STATE OF IDAHO**

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| IN THE MATTER OF MODIFYING THE<br>BOUNDARIES OF THE AMERICAN FALLS<br>GROUND WATER MANAGEMENT AREA | Docket No. [Unassigned]<br><br><b>ASCC Petition to Intervene</b> |
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Aberdeen-Springfield Canal Company (ASCC) hereby petitions to intervene in this matter pursuant to Rules 350-354 of the Rules of Procedure of the Idaho Department of Water Resources. Rule 353 authorizes intervention by anyone who claims “a direct and substantial interest in any part of the subject matter of a proceeding and does not unduly broaden the issues.” ASCC owns groundwater rights within the original boundaries of the American Falls Ground Water Management Area (AFGWMA), and its surface water delivery system affects groundwater levels within the original boundaries of the AFGWMA. ASCC has a direct and substantial interest in this matter because it will be directly affected, potentially even having its groundwater rights curtailed, if the AFGWMA is returned to its original boundaries. Because of ASCC’s unique location, groundwater rights, and water delivery facilities, its interests in this matter are not adequately represented by other parties. Accordingly, ASCC respectfully asks the Director to grant ASCC intervention in this proceeding.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of December, 2013.

RACINE OLSON NYE BUDGE  
 & BAILEY, CHARTERED

By:   
 Thomas J. Budge  
 Attorney for ASCC

**CERTIFICATE OF SERVICE**

I certify that on this 10<sup>th</sup> day of December, 2013, I caused a true and correct copy of the foregoing **ASCC Petition to Intervene** to be served upon the following persons in the manner indicated:

  
 THOMAS J. BUDGE

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| <p><b>Original:</b><br/>         Director, Gary Spackman<br/>         Idaho Department of Water Resources<br/>         PO Box 83720<br/>         Boise, ID 83720-0098<br/>         Attn: Deborah Gibson<br/> <a href="mailto:Deborah.Gibson@idwr.idaho.gov">Deborah.Gibson@idwr.idaho.gov</a><br/> <a href="mailto:Kimi.white@idwr.idaho.gov">Kimi.white@idwr.idaho.gov</a></p>   | <p> <input checked="" type="checkbox"/> U.S. Mail<br/> <input type="checkbox"/> Facsimile<br/> <input type="checkbox"/> Overnight Mail<br/> <input type="checkbox"/> Hand Delivery<br/> <input checked="" type="checkbox"/> Email         </p> |
| <p>Deputy Attorney General<br/>         Garrick L. Baxter<br/>         Idaho Department of Water Resources<br/>         P.O. Box 83720<br/>         Boise, Idaho 83720-0098<br/>         Fax: 208-287-6700<br/> <a href="mailto:garrick.baxter@idwr.idaho.gov">garrick.baxter@idwr.idaho.gov</a></p>  | <p> <input type="checkbox"/> U.S. Mail<br/> <input type="checkbox"/> Facsimile<br/> <input type="checkbox"/> Overnight Mail<br/> <input type="checkbox"/> Hand Delivery<br/> <input checked="" type="checkbox"/> Email         </p>            |
| <p>John K. Simpson<br/>         Travis L. Thompson<br/>         Paul L. Arrington<br/>         Barker, Rosholt &amp; Simpson<br/>         195 River Vista Place, Suite 204<br/>         Twin Falls, ID 83301-3029<br/> <a href="mailto:jks@idahowaters.com">jks@idahowaters.com</a><br/> <a href="mailto:tlt@idahowaters.com">tlt@idahowaters.com</a><br/> <a href="mailto:pla@idahowaters.com">pla@idahowaters.com</a></p> | <p> <input type="checkbox"/> U.S. Mail<br/> <input type="checkbox"/> Facsimile<br/> <input type="checkbox"/> Overnight Mail<br/> <input type="checkbox"/> Hand Delivery<br/> <input checked="" type="checkbox"/> Email         </p>            |
| <p>W. Kent Fletcher<br/>         Fletcher Law Office<br/>         1200 Overland Avenue<br/>         PO Box 248<br/>         Burley, ID 83318<br/> <a href="mailto:wkf@pmt.org">wkf@pmt.org</a></p>  | <p> <input type="checkbox"/> U.S. Mail<br/> <input type="checkbox"/> Facsimile<br/> <input type="checkbox"/> Overnight Mail<br/> <input type="checkbox"/> Hand Delivery<br/> <input checked="" type="checkbox"/> Email         </p>            |
| <p>Josephine Beeman<br/>         Beeman &amp; Associates<br/>         409 W Jefferson<br/>         Boise, ID 83702<br/> <a href="mailto:Jo.beeman@beemanlaw.com">Jo.beeman@beemanlaw.com</a></p>  | <p> <input type="checkbox"/> U.S. Mail<br/> <input type="checkbox"/> Facsimile<br/> <input type="checkbox"/> Overnight Mail<br/> <input type="checkbox"/> Hand Delivery<br/> <input checked="" type="checkbox"/> Email         </p>            |

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|--|---|
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| <p>Scott L. Campbell<br/> Moffatt Thomas<br/> 101 S Capitol Blvd, 10<sup>th</sup> Flr<br/> PO Box 829<br/> Boise, ID 83702-7710<br/> <a href="mailto:slc@moffatt.com">slc@moffatt.com</a></p>  | <p><input type="checkbox"/> U.S. Mail<br/> <input type="checkbox"/> Facsimile<br/> <input type="checkbox"/> Overnight Mail<br/> <input type="checkbox"/> Hand Delivery<br/> <input checked="" type="checkbox"/> Email</p> |