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DEPARTMENT OF
WATER RESOURCES

Scott L. Campbell, ISB No. 2251
Andrew J. Waldera, ISB No. 6608
MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED
101 S. Capitol Blvd., 10th Floor
Post Office Box 829
Boise, Idaho 83701
Telephone (208) 345-2000
Facsimile (208) 385-5384
slc@moffatt.com
ajw@moffatt.com
18946.0026

Attorneys for Pioneer Irrigation District

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF INTEGRATED
MUNICIPAL APPLICATION PACKAGE
("IMAP") OF UNITED WATER IDAHO,
INC. BEING A COLLECTION OF
INDIVIDUAL APPLICATIONS FOR
TRANSFERS OF WATER RIGHTS AND
APPLICATIONS FOR AMENDMENT OF
PERMITS

**PIONEER'S RESPONSE TO UNITED
WATER'S MOTION FOR CLARIFICATION
OF PARTY STATUS**

**I.
INTRODUCTION**

This is the response of Pioneer Irrigation District ("Pioneer") to United Water Idaho's Motion for Clarification of Part Status.

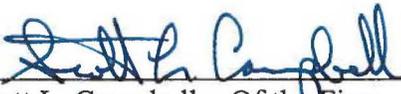
II. DISCUSSION

Pioneer disagrees with United Water Idaho's ("UWID") comments regarding Pioneer's Petition for Reconsideration. First, the UWID comments inappropriately attempt to provide additional substantive argument on the Petition, despite UWID's position at the April 13, 2012 status conference that the matter had been fully briefed. Contrary to UWID's comments in its motion, the sanctions ordered by Peter Anderson were not the result of "serious discovery misconduct." Pioneer reaffirms that it did nothing improper in the discovery responses it provided to UWID.

Moreover, Pioneer believes that UWID is attempting to circumvent the determination of the Director to review the Petition and act on it. In this regard, the Affidavit of Counsel filed concurrently with this Response demonstrates UWID's intent.

DATED this 1st day of May, 2012.

MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED

By  _____
Scott L. Campbell – Of the Firm
Attorneys for Pioneer Irrigation District

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of May, 2012, I caused a true and correct copy of the foregoing **PIONEER'S RESPONSE TO UNITED WATER'S MOTION FOR CLARIFICATION OF PARTY STATUS** to be served by the method indicated below, and addressed to the following:

Director
IDAHO DEPARTMENT OF WATER RESOURCES
322 E. Front Street, 6th Floor
P.O. Box 83720
Boise, ID 83720
gary.spackman@idwr.idaho.gov

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Christopher H. Meyer
Michael P. Lawrence
GIVENS PURSLEY LLP
601 W. Bannock Street
P.O. Box 2720
Boise, ID 83701-2720
chm@givenspursley.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Albert P. Barker
Shelley M. Davis
BARKER ROSHOLT & SIMPSON LLP
1010 W. Jefferson, Suite 102
P.O. Box 2139
Boise, ID 83701-2139
apb@idahowaters.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Thomas H. Barry
Public Works Director
CITY OF MERIDIAN PUBLIC WORKS
DEPARTMENT
33 E. Broadway Avenue, Suite 200
Meridian, ID 83642
tbarry@meridiancity.org

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Kyle Radek
Assistant City Engineer
CITY OF MERIDIAN PUBLIC WORKS
DEPARTMENT
33 E. Broadway Avenue, Suite 200
Meridian, ID 83642
kradek@meridiancity.org

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Josephine P. Beeman
BEEMAN & ASSOCIATES P.C.
409 W. Jefferson Street
Boise, ID 83702
jo.beeman@beemanlaw.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Kathleen M. Carr
U.S. DEPARTMENT OF THE INTERIOR
Office of the Solicitor
Pacific Northwest Region
960 Broadway Street, Suite 400
Boise, ID 83706
kahtleenmarion.carr@sol.doi.gov

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

CITY OF KUNA
City Clerk
763 W. Avalon
P.O. Box 13
Kuna, ID 83634

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

S. Bryce Farris
RINGERT LAW CHTD.
455 S. 3rd
PO Box 2773
Boise, ID 83701-2773
bryce@ringertlaw.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Charles L. Honsinger
HONSINGER LAW PLLC
P.O. Box 517
Boise, ID 83701
honsingerlaw@gmail.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Matt Howard PN-3130
BUREAU OF RECLAMATION
Pacific Northwest Region
1150 North Curtis Road
Boise, ID 83706-1234
mhoward@pn.usbr.gov

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Gordon Law
City Engineer
CITY OF KUNA
P.O. Box 13
Kuna, ID 83634
gordon@cityofkuna.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

E. Gail McGarry
BUREAU OF RECLAMATION
1150 N. Curtis Road, Suite 100
Boise, ID 83706-1234
emcgarry@pn.usbr.gov

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Bruce M. Smith
MOORE SMITH BUXTON & TURCKE, CHTD.
950 W. Bannock, Suite 520
Boise, ID 83702
bms@msbtlaw.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Ed Squires
HYDROLOGIC, INC.
1002 W. Franklin
Boise, ID 83702-5431
ed@hydrologicinc.net

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Robert W. Talboy
ELLSWORTH KALLAS TALBOY PLLC
2402 W. Jefferson
Boise, ID 83702
rwt@greyhawklaw.com

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Matthew K. Wilde
CITY OF BOISE
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500
mwilde@cityofboise.org

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Courtesy Copy
John Westra
Manager Western Region Office
IDAHO DEPARTMENT OF WATER RESOURCES
2735 Airport Way
Boise, ID 83705-5082
john.westra@idwr.idaho.gov

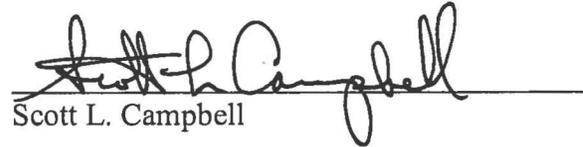
U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Courtesy Copy
Garrick L. Baxter
ATTORNEY GENERAL STATE OF IDAHO
322 E. Front Street, 6th Floor
P.O. Box 83720
Boise, ID 83720-0098
garrick.baxter@idwr.idaho.gov

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile

Courtesy Copy
Jeff Peppersack
Water Allocation Bureau Chief
IDAHO DEPARTMENT OF WATER RESOURCES
322 E. Front Street
P.O. Box 83720
Boise, ID 83720-0098
jeff.peppersack@idwr.idaho.gov

U.S. Mail, Postage Prepaid
 Hand Delivered
 Overnight Mail
 Facsimile


Scott L. Campbell