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DEPARTMENT OF
WATER RESOURCES

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U.S. Department of the Interior, Bureau of Reclamation

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

IN THE MATTER OF DISTRIBUTION OF)
WATER TO VARIOUS WATER RIGHTS)
HELD BY OR FOR THE BENEFIT OF A&B) **RECLAMATION'S MOTION FOR**
IRRIGATION DISTRICT, AMERICAN) **AUTHORITY TO CONDUCT**
FALLS RESERVOIR DISTRICT #2,) **DISCOVERY**
BURLEY IRRIGATION DISTRICT,)
MILNER IRRIGATION DISTRICT,)
MINIDOKA IRRIGATION DISTRICT,)
NORTH SIDE CANAL COMPANY, AND)
TWIN FALLS CANAL COMPANY)
_____)

COMES NOW the U. S. Department of the Interior, Bureau of Reclamation ("Reclamation"), by and through its attorney, Kathleen Marion Carr, Office of the Field Solicitor, and files this Motion to Conduct Discovery of Parties and of the IDWR Staff.

Pursuant to Rule 521 of IDWR's Rules of Procedure, IDAPA 37.01.01.521, Reclamation hereby moves for authority to conduct all forms of discovery listed in Rule 520.01.a-d and to direct that discovery:

- (a) to all other parties in this proceeding, and
- (b) to the IDWR Staff to the extent that the presiding officer in this proceeding may take official notice of

- (i) “any facts that could be judicially noticed in the courts of this state,” Idaho Code § 67-5251(4)(a),
- (ii) any “generally recognized technical or scientific facts within [IDWR’s] specialized knowledge,” § 67-5251(4)(b), and
- (iii) “specific facts or materials noticed and the source thereof, including any [IDWR] staff memoranda and data,” § 67-5251, relevant to this proceeding.

Reclamation respectfully requests that the Director issue an order authorizing Reclamation to conduct discovery as provided above in order to allow a full and fair discussion and analysis of the issues in this matter. Moreover, Reclamation requests that its discovery be allowed to commence as soon as possible.

Respectfully submitted this 7 day of July, 2005.

U.S. Department of the Interior, Bureau of Reclamation

By 
KATHLEEN MARION CARR

CERTIFICATE OF SERVICE

The undersigned certifies that on them / day of July 2005, a true and correct copy of **RECLAMATION'S OPPOSITION TO IGWA'S MOTION TO CONSOLIDATE** was served on the following person(s) as shown below:

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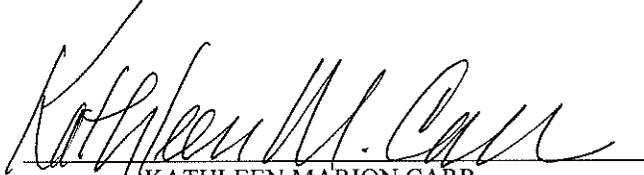
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