

JOSHUA D. HURWIT, Idaho State Bar No. 9527
United States Attorney, District of Idaho
CHRISTINE ENGLAND, Idaho State Bar No. 11390
Assistant United States Attorney, District of Idaho
1290 West Myrtle Street, Suite 500
Boise, ID 83702
Tel: (208) 334-1211; Fax: (208) 334-9375
Christine.England@usdoj.gov

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice
STEPHEN G. BARTELL, Colorado Bar No. 21760
Assistant Section Chief, Natural Resources Section
stephen.bartell@usdoj.gov
DAVID L. NEGRI, Idaho State Bar No. 6997
Trial Attorney, Natural Resources Section
c/o U.S. Attorney's Office
1290 West Myrtle Street, Suite 500
Boise, ID 83702

Tel: (208) 334-1936; Fax: (208) 334-1414
david.negri@usdoj.gov
THOMAS K. SNODGRASS, Colorado Bar No. 31329
Senior Attorney, Natural Resources Section
999 18th Street, South Terrace, Suite 370
Denver, CO 80202
Telephone: 303-844-7233; Fax: 303-844-1350
thomas.snodgrass@usdoj.gov
Counsel for Plaintiff United States of America

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

UNITED STATES OF AMERICA,) Case No. 1:22-cv-00236-DCN
)
Plaintiff,)
)
v.) **UNITED STATES' OPPOSITION TO**
) **JOYCE LIVESTOCK CO., LU**
STATE OF IDAHO; IDAHO DEPARTMENT) **RANCHING CO., PICKETT RANCH &**
OF WATER RESOURCES, an agency of the) **SHEEP CO., AND IDAHO FARM**
State of Idaho; and GARY SPACKMAN, in his) **BUREAU FEDERATION'S MOTION TO**
official capacity as Director of the Idaho) **INTERVENE AS DEFENDANTS (ECF**
Department of Water Resources,) **NO. 19)**
)
Defendants,)
)

v.

IDAHO HOUSE OF REPRESENTATIVES;
MIKE MOYLE, in his official capacity as
Majority Leader of the House; IDAHO
SENATE; and CHUCK WINDER, in his official
capacity as President Pro Tempore of the
Senate,

Intervenor-Defendants.

The United States opposes intervention by Joyce Livestock Co., LU Ranching Co., Pickett Ranch & Sheep Co., and Idaho Farm Bureau Federation because they fail to identify any legally-protectable interest that could be impaired by this action. Indeed, their contention that they hold grazing permits and water rights that may be affected by this suit is wholly unsupportable given that their grazing permits and stockwater rights are not located in the same geographic area or connected in any way to the federal water rights at issue. Moreover, they have failed to demonstrate that the existing parties will not adequately represent their interests. Accordingly, intervention of right should be denied. *See* Fed. R. Civ. P. 24(a).¹

I. PROCEDURAL AND FACTUAL BACKGROUND

The United States filed this action on June 2, 2022, challenging Idaho state administrative proceedings – and the underlying state statutes recently enacted by the Idaho legislature authorizing those proceedings² – which seek to forfeit federally-held water rights. The United States challenges four orders issued by the Idaho Department of Water Resources (“IDWR”) threatening to forfeit 57 federally-held stockwater rights located on four federal land grazing allotments managed by the United States Bureau of Land Management (“BLM”) and 11 federally-held stockwater rights located on one federal land grazing allotment managed by the United States Forest Service. First Am. Compl. For Declaratory & Injunctive Relief ¶ 3 (“Compl.”) (ECF No. 11). Only federally-owned stockwater rights, located on federal lands

¹ As explained in the United States’ Notice of Opposition (ECF No. 24), the United States takes no position on permissive intervention as long as such intervention will not unduly delay or prejudice the adjudication of the original parties’ rights, including any Litigation Plan, Discovery Plan, and briefing schedule agreed to by the existing parties, and is in the interests of judicial economy. *See* Fed. R. Civ. P. 24(b).

² Those state statutes are: Idaho Code §§ 42-113(2)(b), 42-222(2), 42-224, 42-501, 42-502, and 42-504. *See* Compl. ¶¶ 83-110.

within federal grazing allotments, are at issue in this proceeding. No privately-held water rights are at issue.

On August 30, 2022, Plaintiffs and Defendants filed Joint Litigation and Discovery Plans. (ECF Nos. 16, 17). The Court subsequently granted the Idaho House of Representatives *et al.*'s Motion to Intervene³ (ECF No. 23), and the Parties, including those Intervenor-Defendants, filed revised Litigation and Discovery Plans on September 14. (ECF Nos. 27, 28). Joyce Livestock, LU Ranching Co., Pickett Ranch & Sheep Co., and Idaho Farm Bureau Federation (collectively the "Movants") moved to intervene on August 30 (ECF No. 19), and the United States filed its Notice of Intent to Oppose such Motion on September 8 (ECF No. 24).

The United States holds thousands of water rights located on federally-owned land in Idaho that have been decreed or licensed by the State and its courts for use by livestock on federal grazing allotments ("stockwater rights"). Compl. ¶ 1; Decl. of Fredric Price ("Price Decl.") ¶ 7; Decl. of Kathryn Conant ("Conant Decl.") ¶¶ 8, 12. These stockwater rights provide water that is generally available for use by any livestock managed by the holders of permits to graze livestock on the federal lands on which the water rights are located. Compl. ¶ 1.

None of the Movants filed any of the forfeiture petitions that preceded IDWR's orders. *See* Compl. ¶ 3; Price Decl. ¶ 4; Conant Decl. ¶ 15. While some of the Movants do own private water rights, all of those rights have a place of use ("POU") located many miles from the federal grazing allotments that are relevant here. Price Decl. ¶ 6. Joyce Livestock's closest water right POU is over 65 miles from a federal grazing allotment subject to an IDWR order; LU Ranching's closest POU is more than 70 miles away from such; and Pickett Ranch's closest POU is separated by more than 165 miles. *Id.* The Idaho Farm Bureau owns no water rights. *Id.*

³ The United States took no position on the Idaho Legislature's Motion to Intervene.

A. The Snake River Basin Adjudication.

Almost all of the 68 federally-held stockwater rights subject to the IDWR orders at issue in this litigation were decreed to the United States by the Idaho Fifth Judicial District Court through a comprehensive water rights adjudication undertaken pursuant to the McCarran Amendment, 43 U.S.C. § 666, known as the Snake River Basin Adjudication (“SRBA”). Compl. ¶ 31; Price Decl. ¶ 7; Conant Decl. ¶ 15(b).⁴ The McCarran Amendment waives the sovereign immunity of the United States, allowing it to appear in a state forum, only for the comprehensive adjudication of all rights on a stream system in a state and the subsequent administration of decreed rights. *Colo. River Water Conservation Dist. v. United States*, 424 U.S. 800, 812-13 (1976) (wherein the Supreme Court found the McCarran Amendment only provided a limited waiver of sovereign immunity); *S. Delta Water Agency v. United States*, 767 F.2d 531, 541 (9th Cir. 1985) (“Because there has been no prior adjudication of relative general stream water rights in this case, there can be no suit ‘for the administration of such rights’ within the meaning of the McCarran Amendment.”).

In total, following decades of litigation, the SRBA Court decreed over 158,000 water rights. Compl. ¶ 40; Price Decl. ¶ 7. Included in that total were over 15,000 stockwater rights decreed to the United States for use on federal lands managed by the BLM and nearly 9,000 stockwater rights decreed to the United States for use on federal lands managed by the Forest Service. Compl. ¶ 40; Price Decl. ¶ 7; Conant Decl. ¶ 12. All of these decreed water rights were subject to the comprehensive water adjudication process mandated by Idaho statutes, including

⁴ Of these 68 federally-held stockwatering rights, four were not the subject of judicial decrees, but were either licensed to the United States pursuant to Idaho law by IDWR (75-7279, 75-7288, and 75-7335), or filed by the United States under I.C. § 42-243 and qualifying for the SRBA *de minimis* stockwater claims deferral option (75-4241). Conant Decl. ¶ 15(b).

investigation of claims by IDWR, the issuance of a Director's Report from IDWR to the SRBA Court providing the Department's recommendation regarding proper resolution of claims, and the opportunity for objection to all claims by any party to the adjudication. *See* Idaho Code Title 42, Ch. 14.

B. Settlement and Decree of Federal Stockwater Rights.

Pursuant to this established State adjudication process, many of the decreed stockwater rights now held by the United States were the subject of objections by the State or private parties that were eventually resolved either through settlement agreements, withdrawal of the objections, or both. Price Decl. ¶¶ 9-10. Under Idaho statute, an objection to *any* water right claim in the vast area covered by the SRBA could be filed by any other claimant. I.C. § 42-1412(1) ("Any claimant who desires to object to a water right . . . shall file an objection with the district court within the time specified in the notice of filing of the director's report."). An objector did not need to allege that another's claim would negatively impact the objector's own claims nor did the objector's claims even need to be geographically close to the claim to which it objected. Over 1,400 authorized grazing permittees graze livestock on BLM allotments. Price Decl. ¶ 8. Many BLM grazing permittees did not file claims for stockwater on the federal grazing allotments and relied on the BLM to secure these stockwater rights to cover the water use by all permitted livestock. *Id.* Of approximately 1,020 grazing permit holders on Forest Service lands within the SRBA, only 20 filed stockwater claims. Conant Decl. ¶ 11(d).

Two of the Movants, Pickett Ranch and Joyce Livestock, filed objections to 39 of the federally-held rights subject to the IDWR orders, all located on federal lands managed by the BLM within four federal grazing allotments. Price Decl. ¶ 10.b. Neither Pickett Ranch nor Joyce Livestock had stockwater claims nor grazing permits in any of these allotments. *Id.* ¶ 5.

All of these objections were resolved, with the Movants either entering into settlement agreements with the United States or withdrawing their objections years after filing them. *Id.* ¶ 10.

During this process, the United States, Pickett Ranch, and other parties entered into the most comprehensive stockwater rights settlement in the SRBA's lengthy history. After extensive negotiations facilitated by a retained mediator, this settlement agreement provided for the decree of hundreds of water rights located on federal grazing allotments throughout southern and central Idaho, including many of the federally-held stockwater rights before the Court here. *Id.* ¶ 10.c.. Joyce Livestock withdrew its objections when this settlement agreement was executed. *Id.* ¶ 10.d. The settlement followed letters from a number of BLM permittees to the SRBA court and counsel for Pickett Ranch and other objectors, which requested that the objectors withdraw their objections to BLM's water right claims in areas where the BLM permittees held grazing permits and the objectors did not. Price Decl. ¶ 9.

In their Motion, Movants ignore this history and instead, after several of the Movants fully participated through counsel in the SRBA water rights adjudication and agreed to final resolution of their claims and those held by the United States, now complain that the United States obtained these decrees through "default" and improper "pressure," and that there's something fundamentally improper about the government holding water rights. Def.-Intervenors Mem. in Supp. of Mot. to Intervene ("Mem.") at 2, 3, 5 (ECF No. 19-1).⁵ As explained below, Movants have failed to demonstrate the requisite legal and factual basis to support their Motion; their hyperbole, lacking any factual support, should not distract from this failure.

⁵ Remarkably, Movant Pickett Ranch even complains about terms of its water rights settlement with the United States that were negotiated and agreed to by the same attorney it has retained in this proceeding. Mem. at 7.

II. ARGUMENT

A motion for intervention of right must meet a four-part test: 1) the motion must be timely;⁶ 2) the movant must claim a “significantly protectable” interest relating to the property or transaction that is the subject of the action; 3) the movant must be so “situated that the disposition of the action may as a practical matter impair or impede their ability to protect that interest;” and 4) the movant’s “interest must be inadequately represented” by the existing parties to the action. *Cooper v. Newsom*, 13 F.4th 857, 864 (9th Cir. 2021) (citations omitted); see Fed. R. Civ. P. 24(a)(2). “It is incumbent on the party seeking to intervene to show that all the requirements for intervention have been met.” *Cooper*, 13 F.4th at 865 (quoting *Chamness v. Bowen*, 722 F.3d 1110, 1121 (9th Cir. 2013)). Failure to satisfy any of these requirements is fatal to a motion, and a court need not consider other elements if one is not satisfied. *Id.* (quoting *Perry v. Proposition 8 Official Proponents*, 587 F.3d 947, 950 (9th Cir. 2009)). The separate parts of the test, however, are “often []very interrelated,” and any analysis may “reflect that relationship.” *Id.* (quoting Wright & Miller, 7C Fed. Prac. & Proc. Civ. § 1908 (3d ed. Supp. 2022)).

A. Movants Have Asserted No Significantly Protectable Interest In This Action That Will Suffer Any Practical Impairment.

Movants have not shown that they have any protectable interest at issue in this litigation or impairment of that interest. A protectable interest sufficient to justify intervention as of right is only present where a movant has a legally protectable interest that will suffer a practical impairment in the pending litigation. *Cooper*, 13 F.4th at 865 (quoting *Cal. ex. Rel. Lockyer v. United States*, 450 F.3d 436, 441 (9th Cir. 2006)). A movant has a significantly protectable interest in an action only if “(1) it asserts an interest that is protected under some law, and (2)

⁶ The United States is not challenging the timeliness of the Motion.

there is a ‘relationship’ between its legally protected interest and the plaintiff’s claims.” *Lockyer*, 450 F.3d at 441 (quoting *Donnelly v. Glickman*, 159 F.3d 405, 409 (9th Cir. 1998)). Where resolution of the pending litigation will not affect the claimed interest, the required relationship between the claimed interest and the pending litigation does not exist, and intervention as of right must be denied. *Donnelly*, 159 F.3d at 410 (citing *Montana v. United States Env’tl. Protection Agency*, 137 F.3d 1135, 1141-42 (9th Cir. 1998)); *Greene v. United States*, 996 F.2d 973, 976-78 (9th Cir.1993)).

Here, Movants have asserted no interest that would be affected by this litigation. They appear to present their federal land grazing permits and stockwater rights as a “protectable interest,” but they fail to explain how such interests could be affected by this litigation. Indeed, they fail to explain to the Court that these asserted “protectable interests” are not located in or near the federal land grazing allotments for which they hold grazing permits. *See* Price Decl. ¶¶ 5-6. Similarly, they do not assert any relationship between their stockwater rights and the federal water rights at issue. One of the Movants, the Idaho Farm Bureau, has no water rights at all. *Id.* ¶ 6. For those that do hold private water rights, they do not assert that use or non-use of the federal water rights will affect the availability of water to fulfill their rights in any way or that the federal and private water rights are hydrologically connected such that use of one will impact the other. The required relationship simply does not exist. Although they assert that they need to take part “to defend the water rights they own pursuant to Idaho’s law,” Mem. at 3, their water rights are simply not at issue in this litigation, and no decision here will affect those rights in any way.

Perhaps recognizing that this legal requirement is lacking, LU Ranching posits that there is a “legal cloud over our property rights,” but offers no further explanation. Decl. of Tim Lowry

¶ 16 (ECF No. 19-6). A perceived “legal cloud” is not the relevant legal standard in the first instance and, in any event, none of LU Ranching’s water rights are at issue in this litigation, and none of the federal water rights that are subject to IDWR orders are located near those of LU Ranching. In short, there is no significantly protectable interest held by LU Ranching or any other Movant that satisfies the necessary requirements for intervention.

Rather than provide the requisite explanation of how this case will practically affect their interests, Movants make generalized assertions that “[t]his case exists only because grazing permittees’ interest in their stockwater rights conflicts with existing and potential competing claims by the United States to the same water.” Mem. at 10. In addition to being patently untrue – this case exists because the State is trying to forfeit federally-held property – Movants fail to describe any such “conflict” with their water rights or how the federal water rights at issue “compete” with their rights. That is because the federal and private rights are disconnected, and no such conflict exists.

Similarly, Movants broadly assert that the “outcome of this case . . . will make Ranchers’ rights easier or more difficult to preserve and/or vindicate.” *Id.* But this case does not concern any unnamed “Ranchers’ rights,” and it does not concern any rights possessed by these particular Movants. And Movants unsupported claim that “[t]his case will determine how, when, and whether competing claims made or decrees held by the United States are evaluated and potentially identified as having been forfeited,” *id.*, neglects to recognize that Movants have identified no competing claim or decreed rights they hold that are related to the water rights subject to the IDWR orders at issue here.

The lack of legal support for Movants position is exhibited by their reliance on one inapplicable and unpublished decision of this Court, *Western Watersheds Project v. U.S. Fish*

and Wildlife Service, No. 4:CV 10-229-BLW, 2011 WL 2690430 (D. Idaho July 9, 2011). As recognized in Movants' brief, *Western Watersheds*' holding that the ranchers in that case had interests sufficient to justify intervention of right turned on a finding that resolution of the case could force the ranchers "to adopt expensive mitigation measures and [they] could be barred altogether from conducting their activities in certain areas." *Id.* at *2-3. Not only do Movants fail to show significant impacts such as these, they demonstrate no possible impacts at all. Incidental affects and general interests are not sufficient to establish the required significant protected interest. *Cooper*, 13 F.4th at 867. Because Movants have failed to assert any legally protectable interest that will suffer a practical impairment in the pending litigation, their Motion to intervene as of right should be denied.

B. Movants Have Failed To Demonstrate That Their Interests Are Not Adequately Protected.

Even if the Movants had a legally protectable interest at stake in this litigation – which they do not – Movants' interests in this case align completely with the named Defendants, as well as the State Legislature Intervenor, and Movants cannot demonstrate that their interests are not adequately protected. For this reason also intervention of right should be denied.

In general, when considering intervention, states are "deemed to represent all its citizens." *Nebraska v. Wyoming*, 515 U.S. 1, 21 (1995) (quoting *Kentucky v. Indiana*, 281 U.S. 163 (1930)). In considering intervention by private parties in a water rights dispute, the Supreme Court held that a "State is presumed to speak in the bests interests of those citizens." *Id.*; *Gonzalez v. Arizona*, 485 F.3d 1041, 1052 (9th Cir. 2007) ("Where 'the government is acting on behalf of a constituency it represents,' as it is here, this court assumes that the government will adequately represent that constituency." (quoting *Prete v. Bradbury*, 438 F.3d 949, 956 (9th Cir.2006))).

Where, as here, Movants and Defendants share the same interests, “[i]n the absence of a ‘very compelling showing to the contrary’ it will be presumed that a state adequately represents its citizens.” *Lockyer*, 450 F.3d at 443 (quoting *Arakaki v. Cayetano*, 324 F.3d 1078, 1086 (9th Cir. 2003)); *see also Arakaki*, 324 F.3d at 1086 (“When an applicant for intervention and an existing party have the same ultimate objective, a presumption of adequacy of representation arises.” (citation omitted)). This principle is particularly robust when government lawyers are defending the constitutionality of legislative enactments. *See Lockyer*, 450 F.3d at 444. To overcome this presumption, movants “must make a ‘very compelling showing’ that the government will not adequately represent its interest.” *Gonzalez*, 485 F.3d at 1052 (citing *Prete*, 438 F.3d at 1086).

In determining whether a movant sustained its burden, a court should “consider several factors, including whether the [Defendants] will undoubtedly make all of the intervenor's arguments, whether the [Defendant] is capable of and willing to make such arguments, and whether the intervenor offers a necessary element to the proceedings that would be neglected.” *Sagebrush Rebellion, Inc. v. Watt*, 713 F.2d 525, 528 (9th Cir. 1983). Where the validity of legislative enactments is at issue, “[i]n order to make a ‘very compelling showing’ of the government's inadequacy, the proposed intervenor must demonstrate a likelihood that the government will abandon or concede a potentially meritorious reading of the statute.” *Lockyer*, 450 F.3d at 444.

Movants have not, and cannot, satisfy any of these factors. They make no showing that they bring any necessary element to this litigation and do not allege that Defendants are not capable of and willing to make any particular argument. That is understandable, given that Defendants (and Intervenor) have an obvious interest in vigorously defending the IDWR

administrative proceedings and the state statutes at issue here. Instead of providing the required showing, Movants present the Court with only generalized speculation. *E.g.*, Mem. at 11 (“The interests of government and the private sector may diverge.” (citations omitted)).

In a comment particularly apt here, the Advisory Committee on Civil Rules explained the importance of requiring a showing of inadequate representation to protect against “a cluttering of lawsuits with multitudinous useless intervenors.” Wright & Miller, 7C Fed. Prac. & Proc. Civ. § 1909 (3d ed. Supp. 2022) (quoting Advisory Committee Reporter). Movants have nothing to add here, and their Motion should be denied.

III. CONCLUSION

Movants have not shown that they have any legally protectable interest that will suffer a practical impairment in this litigation. Nor have they shown that their interests are not adequately represented by Defendants and Intervenors. Because both showings are necessary, intervention as of right should be denied.

Respectively submitted this 7th day of October, 2022.

JOSHUA D. HURWIT
United States Attorney
CHRISTINE ENGLAND
Assistant United States Attorney

TODD KIM
Assistant Attorney General
U.S. Department of Justice
STEPHEN G. BARTELL
Assistant Section Chief
THOMAS K. SNODGRASS
Senior Attorney

/s/ David L. Negri

DAVID L. NEGRI
Trial Attorney

Counsel for Plaintiff

JOSHUA D. HURWIT, Idaho State Bar No. 9527
United States Attorney, District of Idaho
CHRISTINE ENGLAND, Idaho State Bar No. 11390
Assistant United States Attorney, District of Idaho
1290 West Myrtle Street, Suite 500
Boise, ID 83702
Tel: (208) 334-1211; Fax: (208) 334-9375
Christine.England@usdoj.gov

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice
STEPHEN G. BARTELL, Colorado Bar No. 21760
Assistant Section Chief, Natural Resources Section
stephen.bartell@usdoj.gov
DAVID L. NEGRI, Idaho State Bar No. 6997
Trial Attorney, Natural Resources Section
c/o U.S. Attorney's Office
1290 West Myrtle Street, Suite 500
Boise, ID 83702

Tel: (208) 334-1936; Fax: (208) 334-1414
david.negri@usdoj.gov
THOMAS K. SNODGRASS, Colorado Bar No. 31329
Senior Attorney, Natural Resources Section
999 18th Street, South Terrace, Suite 370
Denver, CO 80202
Telephone: 303-844-7233; Fax: 303-844-1350
thomas.snodgrass@usdoj.gov
Counsel for Plaintiff United States of America

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

UNITED STATES OF AMERICA,) Case No. 1:22-cv-00236-DCN
)
Plaintiff,)
)
v.) **DECLARATION OF FREDRIC W. PRICE**
)
STATE OF IDAHO; IDAHO DEPARTMENT)
OF WATER RESOURCES, an agency of the)
State of Idaho; and GARY SPACKMAN, in his)
official capacity as Director of the Idaho)
Department of Water Resources,)
)
Defendants,)
)

v.

IDAHO HOUSE OF REPRESENTATIVES;
MIKE MOYLE, in his official capacity as
Majority Leader of the House; IDAHO
SENATE; and CHUCK WINDER, in his official
capacity as President Pro Tempore of the
Senate,

Intervenor-Defendants.

I, Fredric W. Price, in accordance with the requirements of 28 U.S.C. § 1746, declare as follows:

1. My name is Fredric W. Price. I am an employee of the United States, Department of Interior, Bureau of Land Management (“BLM”). The following statements are based upon my personal knowledge. My present position is that of Water Rights Specialist for the BLM Idaho State Office. My current responsibilities include being the program lead for water issues in Idaho and a portion of Nevada for Idaho BLM and managing BLM’s participation in general stream adjudications in Idaho and part of Nevada, including the Snake River Basin Adjudication (“SRBA”) and adjudications in other river basins. I develop agency policy on water-related issues and in other programs affected by water issues, such as the range management and lands programs. I also review, interpret and analyze water right applications /claims. Based on this review and analysis, I prepare opinions, recommendations, protests, objections, and responses for administrative and adjudication matters.

2. I have been employed by the BLM since 1982 and in my current position as Water Rights Specialist at the BLM State Office in Boise, Idaho since August 1993. In my position, as part of BLM’s due diligence in evaluating claims and objections within a general stream adjudication or in evaluating applications and protests before IDWR in administrative proceedings, I have reviewed tens of thousands of legal land descriptions focusing on Points of Diversion (“POD”), Places of Use (“POU”), and the route of the conveyance means between the POD and POU (“route”) that are contained in Applications for Water Permit, Applications for Transfer, Applications for Temporary Permit, Notices of Instream Diversion, Notices of Claim, IDWR Director’s Report Recommendations, Standard Forms 5 (*i.e.*, settled elements of the water right), Special Master’s Reports, and Partial Decrees. Since the early 1980s, I have developed

extensive knowledge in interpreting maps, aerial photos and legal land descriptions, as well as in the use various computer mapping software applications, also known as geographic information systems (“GIS”), to create thousands of maps from many different data sets. I have filed or assisted in the filing of approximately 10,000 BLM objections and resolved or assisted in the resolution of approximately 96,000 objections filed against BLM. I have testified as a witness or by affidavit numerous times before IDWR hearing officers, as well as in state and federal courts regarding water rights issues and federal ownership of land. I have prepared affidavits, declarations, reports, and maps as exhibits for use by BLM, the Department of the Interior’s Solicitor's Office, and the Department of Justice.

3. I have researched information about the U.S. stockwater rights that are the subject of the four forfeiture petitions at issue in this proceeding and the stockwater rights of the movants for intervention: Joyce Livestock Co., L U Ranching Co., Pickett Ranch & Sheep Co., or Idaho Farm Bureau Federation (collectively “Movants”). I have reviewed the Idaho Department of Water Resources (“IDWR”) show cause orders and the precipitating petitions asserting forfeiture. IDWR’s four show cause orders pertain to a total of 68 United States stockwater rights – three of the show cause orders partially granted three petitions that pertain to 57 stockwater rights across four BLM grazing allotments on federal lands managed by BLM (see below), and the fourth show cause order partially granted a petition that pertains to 11 stockwater rights on one grazing allotment on federal lands managed by the Forest Service. The petitions affecting BLM stockwater rights were filed by Soulen Livestock Co., Soulen Grazing Association, LLC, and Gill Family Ranches, LLC. The petition affecting Forest Service stockwater rights was filed by Jaycob J. and Sheyenne A. Smith.

4. Based on my review of petitions and show cause orders, only federally-owned stockwater rights, located on federal lands within federal grazing allotments, are at issue in this proceeding. No privately-held water rights are at issue. None of the Movants filed petitions against the BLM water rights at issue in this proceeding. The IDWR show cause orders involve the following BLM grazing allotments: Crane Creek (No. ID00361); Paddock Valley (No. ID00370); Butcher Bar (No. ID36138); and China Creek (ID36191). I summarize the IDWR show cause orders below:

Order P-OSC-2021-001 (issued 04/25/2022, amended 05/13/2022)
Petition filed by: Soulen Livestock Co. and Soulen Grazing Assoc.
BLM Allotment: Crane Creek (No. ID00361)
Water Rights: 22 BLM water rights

Order P-OSC-2021-002 (issued 04/25/2022, amended 05/13/2022)
Petition filed by: Soulen Livestock Co. and Soulen Grazing Assoc.
BLM Allotment: Paddock Valley (No. ID00370)
Water Rights: 30 BLM water rights

Order P-OSC-2021-004 (issued 04/25/2022, amended 05/13/2022)
Petition filed by: Gill Family Ranches, LLC
BLM Allotment: Butcher Bar (No. ID36138) and China Creek (ID36191)
Water Rights: 2 BLM water rights in Butcher Bar and 3 BLM water rights in China Creek

Order P-OSC2022-001 (issued 06/22/2022)
Petition filed by: Jaycob J. and Sheyenne A. Smith
Forest Service Allotment: Fourth of July Creek (No. 70213)
Water Rights: 11 Forest Service water rights

5. On October 4, 2022, I accessed BLM's Rangeland Administrative System ("RAS") (<https://reports.blm.gov/reports.cfm?application=RAS>) to run Allotment Master Reports to determine who the authorized grazing permittees are in the BLM allotments. Based on my review of BLM grazing administration records, none of the Movants are authorized to graze livestock in the grazing allotments subject to this proceeding. I summarize the authorized livestock operators below:

Crane Creek Allotment (ID00361):

- Soulen Grazing Association, LLC
- David Maddox
- Jerome & Jill Grandi
- Sutton Ranches, Inc.

Paddock Valley Allotment (ID00370):

- Soulen Grazing Association, LLC

Butcher Bar Allotment (ID36138):

- Gill Family Ranches, LLC

China Creek Allotment (ID36191):

- Gill Family Ranches, LLC

6. I have determined the location of the Movants' water rights relative to the BLM water rights subject to this proceeding. Based on my research of IDWR SRBA records (see below), the Movants (except for Idaho Farm Bureau Federation) do own private water rights; however, each of those rights has a POU located many miles from the federal grazing allotments that are here relevant. None of Movants hold water rights or interests in water rights near the POU for any of the subject BLM water rights or in the BLM grazing allotments where those POUs are located (see calculated distances below).

In order to determine how far away the water right interests are between the subject BLM water rights and the Movants' water rights, I downloaded a graphical dataset (i.e. GIS shapefiles) of water right places of use from IDWR's public website (<https://data-idwr.hub.arcgis.com/documents/place-of-use-water-right/about>). Each graphical record in this shapefile depicts a polygon representing the POU for each purpose of use under each water right, and each record contains a number of data fields associated with it that can be viewed in the attribute table. One of the data fields available is "owner;" therefore, I was able to perform a query of the "owner" data field for iterations of each Movant's organization name and export this

query to a new graphical dataset so that I could display just the water rights of the Movants.

Based on my search of IDWR's data systems, the Idaho Farm Bureau Federation is not an owner of any water rights in Idaho. I also queried out the BLM and Forest Service water rights at issue in this proceeding from the same dataset.

The computer mapping program I use is called Arc Map by ESRI and it has a tool called "Measure" where I can measure the distance between two points within my map. I used the tool to measure the distance in miles between the closest Movant water right POU and the closest BLM water right POU within each grazing allotment at issue in this proceeding. The results of these measurements are summarized in the table below and on the map attached hereto as **Exhibit 1**. I prepared Exhibit 1 and it is a true and correct representation of the information described above.

	Crane Creek	Paddock Valley	China Creek	Butcher Bar	4th of July Creek
Joyce Livestock	82 mi	66 mi	168 mi	168 mi	209 mi
L U Ranching	88 mi	74 mi	176 mi	176 mi	223 mi
Pickett Ranch	184 mi	167 mi	241 mi	242 mi	206 mi

7. All 57 BLM stockwater rights subject to the IDWR orders at issue in this litigation were decreed to BLM by the Idaho Fifth District Court in the SRBA, which is a comprehensive water rights adjudication undertaken pursuant to the McCarran Amendment, 43 USC § 666. It is my understanding that the SRBA Court decreed over 158,000 water rights. From my review of the Final Unified Decree entered in the SRBA on August 26, 2014, the United States received 27,427 partial decrees through 17 different federal agencies. BLM received 16,939 partial decrees and the Forest Service received 10,274 partial decrees. From my review of BLM records and based on my personal knowledge, the overwhelming majority of

BLM's 16,939 partial decrees in the SRBA were for stockwatering and wildlife purposes and can be categorized by the following estimates: approximately 2,725 for diverted stockwater (*i.e.*, diverted through a physical structure/facility into tanks, troughs, ponds, etc.); approximately 6,485 for instream stockwater; approximately 6,500 for stockwater under federal reserved rights (mostly based on the federal reserve known as Public Water Reserve 107); and approximately 1,212 for other purposes. Most of BLM's water rights that included a stockwater purpose of use (approximately 15,710 total with 9,210 based on state law and 6,500 based on federal law) are for relatively small but important quantities of water due to the aridness of the lands and climate.

As a result of the SRBA, the United States holds thousands of water rights located on federally-owned land in Idaho that have been decreed or licensed by the State and its courts for use by livestock on federal grazing allotments. These stockwater rights provide water that is generally available for consumptive use by any livestock managed by the holders of permits to graze livestock on the federal lands on which the water rights are located.

8. In Idaho, BLM manages 2,113 allotments and 1,421 authorized grazing permittees. Leading up to the SRBA, BLM held meetings with members of the livestock industry to talk about filing stockwater claims in the adjudication. Based on my review of and familiarity with BLM records, BLM decided it would carry the burden of pursuing stockwater rights on federal land, among other reasons, because BLM could secure appropriations and had the expertise to successfully undertake this massive endeavor. As a consequence, many BLM grazing permittees did not file claims for stockwater on the federal grazing allotments and relied on the BLM to secure these stockwater rights to cover the water use by all permitted livestock. As an example, a true and correct copy of the Bauscher Ranch, Inc. letter dated January 23, 2002, is attached hereto as part of **Exhibit 2**. The letter stated, "No one had any quarrel with the water rights

being in the name of the land owner, including the federal government.” In my experience resolving thousands of objections, many of BLM’s objections to claims filed by grazing permittees (and vice versa) were resolved by the grazing permittee withdrawing their claims once they realized BLM had already filed claims to those water sources.

9. Beginning in 1998, the members of the Federal Stockwater Group (“FSG”) eventually objected to a total of 5,605 BLM claims across Idaho, including many of the BLM water rights at issue in this proceeding (specifically 39 of 57). The FSG was an informal association of federal land grazing permittees who claimed water rights on federal lands and filed objections to federal stockwater claims throughout the SRBA.

During the pendency of the FSG litigation, BLM began meeting with affected grazing permittees outside of federal grazing allotments on which the FSG members held grazing permits. Affected permittees elsewhere had demanded the FSG withdraw 493 objections to BLM claims within their grazing allotments because they were relying on BLM’s claims. True and correct copies of letters in support of BLM water rights are attached as **Exhibit 2**. Subsequently, those 493 objections were withdrawn. On August 29, 2002, the FSG ultimately settled with the United States on the remainder of its objections by agreeing to the decree of BLM and Forest Service water rights by the court. The FSG agreement resolved the objections filed by 45 private parties, including Pickett Ranch & Sheep Co. On March 11, 2003, the State Attorney General (acting in its sovereign capacity) also settled its objections. Most of the thousands of decreed stockwater rights now held by the BLM were the subject of objections by the State of Idaho or private parties that were eventually resolved either through settlement agreements (of one form or another), withdrawal of objections, or both.

10. I have researched the SRBA litigation history of all 57 BLM water rights subject to this proceeding and was able to determine that every single BLM water right was contested before settlement agreements were filed with the court and decrees were issued to BLM by the SRBA Court. All 57 BLM water rights were objected to by either the State of Idaho, or federal grazing permittees, or both. All objections to the 57 BLM water rights were resolved, and all 57 BLM water rights were decreed by the SRBA Court.

a. On September 17, 1999, the State of Idaho filed objections to 56 of the 57 BLM water rights subject to this proceeding.

b. On September 17, 1999, one of the attorneys of record for Movants (Norman Semanko) (herein “Movants’ Counsel”) filed objections to 39 of the 57 BLM water rights subject to this proceeding (including the one subcase not objected to by the State of Idaho) on behalf of 11 federal grazing permittees, including Pickett Ranch & Sheep Co. and Joyce Livestock Co.

c. On August 29, 2002, a Stipulation and Joint Motion for Order Approving Stipulation providing for the decree of thousands of federal and private water stockwater rights throughout southern and central Idaho was filed with the court by the United States and 45 members of the FSG, all represented by Movants’ Counsel. A true and correct copy of this Stipulation is attached as **Exhibit 3**.

d. On August 29, 2002, Movants’ Counsel filed a Notice of Withdrawal of Objections and Responses on behalf of Bruce Bedke, Jared Bedke, Joyce Livestock Co., and Jerry Hoagland.

e. On August 29, 2002, Movants’ Counsel filed a Notice of Withdrawal of Objections and Responses on behalf of 20 members of the FSG.

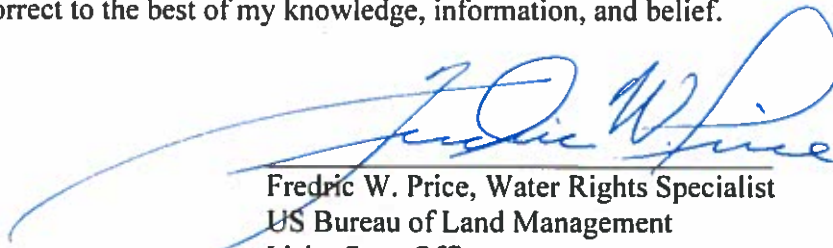
f. On March 11, 2003, a Stipulation to Resolve Objections was filed with the SRBA Court to resolve the State of Idaho objections to BLM claims that included all BLM claims subject to this proceeding in Crane Creek, Butcher Bar, and China Creek Allotments, and the BLM claims within Basin 67 in the Paddock Valley Allotment.

g. On July 1, 1999, a Stipulation to Resolve Subcases was filed with the SRBA Court to resolve State of Idaho objections to BLM claims within Basin 65 in the Paddock Valley Allotment.

h. On May 6, 2004, the SRBA Court issued partial decrees to BLM for water rights that include those in the Crane Creek, Butcher Bar, and China Creek Allotments at issue here. On June 3, 2004, the SRBA Court issued partial decrees to BLM for water rights that include those in the Paddock Valley Allotment at issue here.

Dated: October 7, 2022

Pursuant to the provisions of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.



Fredric W. Price, Water Rights Specialist
US Bureau of Land Management
Idaho State Office

EXHIBIT 1

DECLARATION OF FREDRIC W. PRICE

United States of America v. State of Idaho et al.

Case No. 1:22-cv-00236-DCN

Exhibit 1

Federal Grazing Allotments Under IDWR Orders Relative To Movants' Water Right Places of Use

	Crane Creek	Paddock Valley	China Creek	Butcher Bar	4th of July Creek
Joyce Livestock	82 mi	66 mi	168 mi	168 mi	209 mi
L U Ranching	88 mi	74 mi	176 mi	176 mi	223 mi
Pickett Ranch	184 mi	167 mi	241 mi	242 mi	206 mi

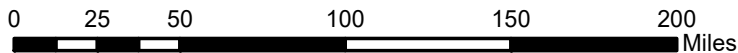
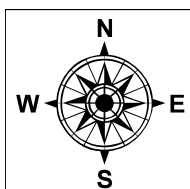
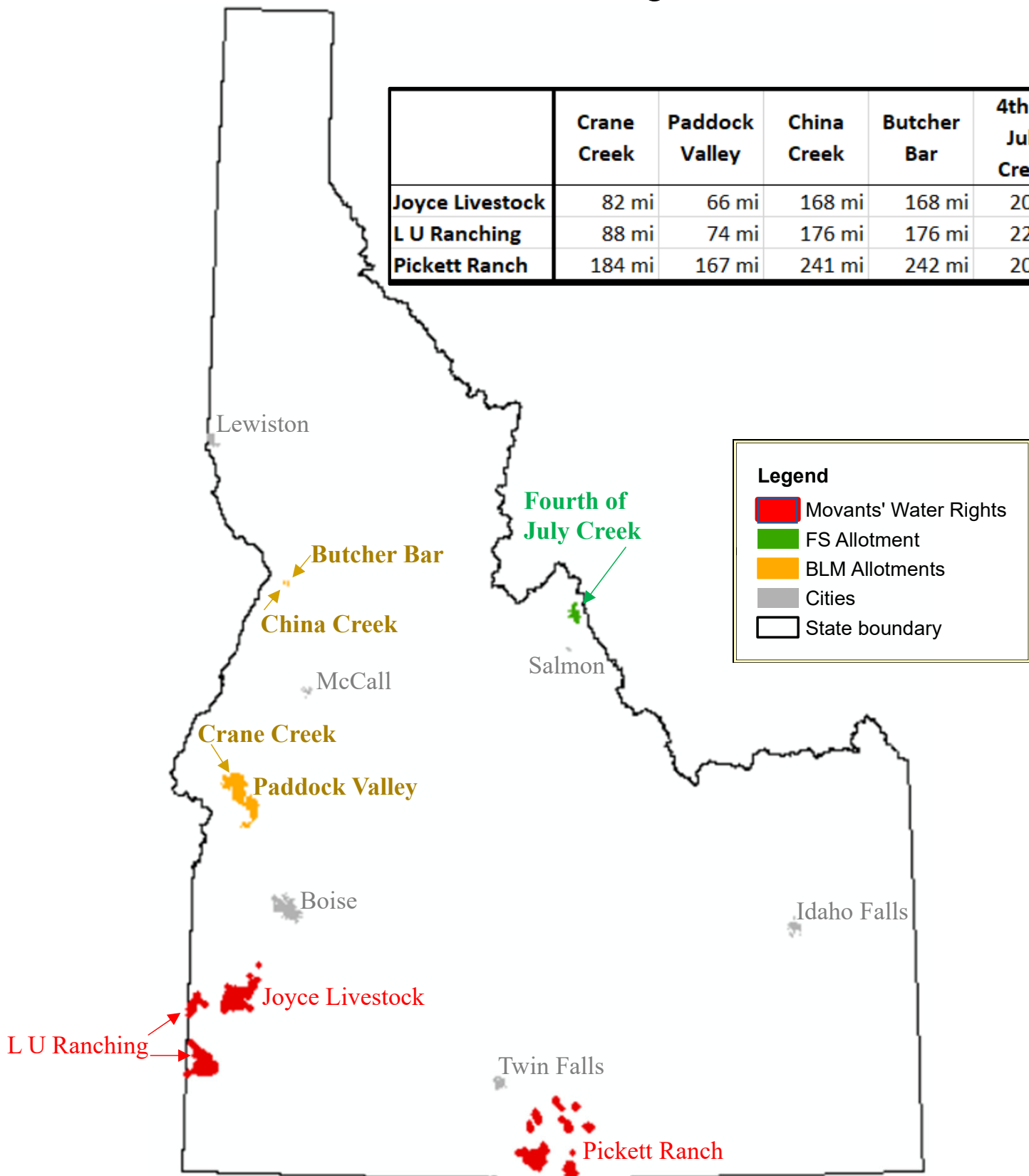


EXHIBIT 2

DECLARATION OF FREDRIC W. PRICE

United States of America v. State of Idaho et al.
Case No. 1:22-cv-00236-DCN

APR-28-2006 FRI 02:55 PM BLM IDAHO FALLS/DO

FAX NO. 208 524 7505

P. 21

Bauscher Ranch, Inc.

Winter Address
1874 Leadville Avenue
Boise, Idaho 83706

Summer Address
P.O. Box 333
Fairfield, Idaho 83327

Mr. Norman M. Semanko
Barker, Rosholt & Simpson, LLP
P.O. Box 2139
Boise, Idaho 83701-2139

Re: Withdrawal of objections to federal stockwater claims in my BLM grazing allotments.

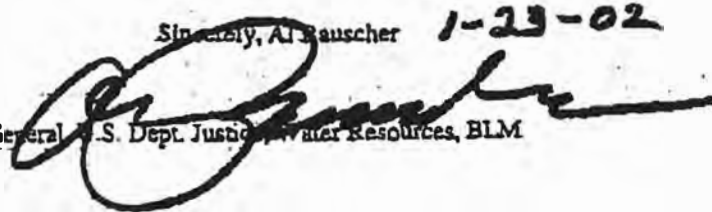
Dear Mr. Semanko:

After discussing the matter with both BLM and Forest Service Employees, it is my understanding that you filed objections to all federal stockwater claims in Water Basin 37. Your objections were filed for your clients with ranches and federal grazing permits located entirely south of the Snake River. I have been informed that none of your clients have any BLM grazing rights in my Black Canyon and Deer Creek allotments. I see no reason for you to file objections here because none of your people are affected by any of the water right claims here in this basin regardless of who made the claims.

The stockmen here were made aware of BLM's plans very early in the Adjudication. The Shoshone BLM employee who filed the stockwater claims on BLM land came to our District Grazing Advisory Board, in regular session, and explained that BLM planned to file stockwater claims on the BLM land in behalf of the stockmen to save them time and money and avoid confusion. It made a lot of sense for the BLM to file water claims on their land for all at one time. We were told that we should file adjudication water claims on any deeded ground we held in any of our allotments because BLM would not file for a water right on private land unless they held a signed easement and had a water permit or license from the State of Idaho. We were advised to talk to the State Lands people about any waters on our State leases. That approach seemed reasonable to all of us, and the Board approved that approach. No one had any quarrel with the water rights being in the name of the land owner, including the federal government. Now after all these years, I find out that you do not like our arrangement.

I want you to immediately withdraw all your objections to the BLM water claims on BLM land in my Black Canyon and Deer Creek units. I asked the Shoshone BLM Office to send me a list of their claims and have included that list with this letter. I also want you to send me some evidence that you followed through on this. I don't want to find out later that you did not take this letter seriously.

Sincerely, Al Bauscher

1-23-02


cc: Adjudication Court, State Attorney General, U.S. Dept. Justice, Water Resources, BLM

APR-28-2006 FRI 02:56 PM BLM IDAHO FALLS/DO

FAX NO. 208 524 7505

P. 22

**Bauscher Ranch Inc. Grazing Allotments With Public Land Water
Right Claims For Stockwater Made By
The United States, Department of Interior,
Bureau of Land Management**

BLACK CANYON ALLOTMENT, No. 90418

37-02807	37-18148	37- 8207	37-18270	37-19195
37-02808	37-18153	37- 8208	37-18279	37-19199
37-02838	37-18159	37- 8209	37-18282	37-19200
37-02841	37-18161	37- 8210	37-18283	37-19201
37-02904	37-18163	37- 8211	37-18286	37-19202
37-02913	37-18165	37- 8212	37-18292	37-19203
37-02939	37-18166	37- 8213	37-18293	37-19204
37-02941	37-18169	37- 8215	37-18295	37-19507
37-02948	37-18175	37- 8216	37-18298	37-19508
37-02953	37-18176	37- 8218	37-18299	37-19509
37-02962	37-18177	37- 8219	37-18300	37-19548
37-02963	37-18178	37- 8221	37-18304	37-19549
37-02965	37-18179	37- 8232	37-18306	37-19630
37-02985	37-18180	37- 8234	37-18308	37-20208
37-02993	37-18181	37- 8235	37-18312	37-20210
37-03017	37-18182	37- 8237	37-18315	37-20211
37-03018	37-18184	37- 8238	37-18318	37-20222
37-03075	37-18185	37- 8239	37-18319	37-20223
37-03081	37-18186	37- 8240	37-18320	37-20224
37-04197	37-18190	37- 8249	37-18322	37-20225
37-04198	37-18197	37- 8250	37-18331	37-20239
37-04261	37-18198	37- 8253	37-18336	37-20240
37-04355	37-18199	37- 8254	37-18341	37-20241
37-08042	37-18200	37- 8255	37-18344	37-20254
37-08162	37-18202	37- 8254	37-18347	37-20255
37-08163	37-18203	37- 8265	37-18363	37-20256
37-18146	37-18204	37- 8266	37-18369	37-20260
37-18147	37-18205	37-18267	37-18386	

**Bauscher Ranch Inc. Grazing Allotments With Public Land Water
Right Claims For Stockwater Made By
The United States, Department of Interior,
Bureau of Land Management**

DEER CREEK ALLTOMENT, No. 0114

37-03139	37-18400	37-18415
37-03141	37-18401	37-18416
37-03142	37-18402	37-18418
37-03144	37-18403	37-18428
37-03145	37-18404	37-19211
37-03146	37-18405	37-19212
37-18393	37-18406	37-19213
37-18394	37-18407	37-19214
37-18395	37-18408	37-19429
37-18396	37-18409	37-20151
37-18397	37-18410	37-20175
37-18398	37-18413	37-20242
37-18399	37-18414	37-20243

Exhibit 2

APR-28-2006 FRI 02:54 PM BLM IDAHO FALLS/DO

FAX NO. 208 524 7505

P. 15

DATE	TIME	FILE	INIT.

REC'D BY: [unclear] OFFICE

001 FEB 07 2002 BLM

LEO AMY & SONS
VA RANCH
1398 HWY 22-33
HOWE, IDAHO 83244

Mr. Norman M. Samanko
Barker, Rosholt & Simpson, LLP
P.O.Box 2139
Boise, Idaho 83701-2139

February 1, 2002

Dear Sirs:

We understand that you have filed objections to all stockwater claims in Deep Creek Pipeline: Water Right #33-07125 (3303488030) and Sheep Spring Pipeline: Water Right #33-02145 (3303488003). Since your objections were filed for your clients with ranches and federal grazing permits located entirely south of the Snake River and you do not run cattle or sheep in these allotments we are requesting that you withdraw all your objections to all BLM water claims on public land within out grazing allotments. The BLM were within their rights to make these stockwater right filings on water appurtenant to the public land. The BLM stockwater claims were made in behalf of, and for the benefit of, those of us who are permitted to graze livestock on BLM ground. By making those water claims the BLM has saved us much money, time and effort and made it possible for us to make a living in the livestock industry. We consider this as part of Idaho's economy.

It is hard enough for small operations such as ours without having to fight other ranchers. We are all in this business together and should try to co-operate with one another.

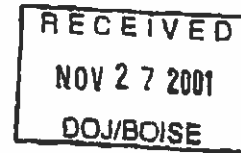
Exhibit 2

Sincerely,

Leo D. Amy
Kelly Amy
Dee L. Amy

cc: IDWR, BLM, U.S. Department of Interior, U.S. Dept. of Justice, Snake River Adjudication Court

PICABO LIVESTOCK CO.
Box 688
Picabo, Idaho 83348
ph 208-788-3530
fax 208-788-0214



November 25, 2001

Mr. Norman M. Semanko
Barker, Rosholt & Simpson, LLP
P.O. Box 2139
Boise, Idaho 83701-2139

Re: Withdrawal of objections to federal stockwater claims in my BLM grazing allotments.

Dear Mr. Semanko

I understand that you filed objections to all BLM stockwater claims in Water Basin 37. Those objections were filed on behalf of your clients whose livestock operations are headquartered and located entirely south of the Snake River. I don't think any of them run cattle or sheep on land managed by the Shoshone BLM Office.

I understand that you also filed responses to BLM's objections to private-party claims on BLM land in Water Basin 37. You filed a response to BLM's objection to my water right claim number 37-12014. I worked with the BLM and other officials to correct some errors in that water right filing and I am satisfied with the result. You withdrew that response after the BLM and I agreed on the changes. I appreciate your withdrawal.

By this letter I am requesting that you also immediately withdraw all your objections to all BLM water claims on public land within my grazing allotments. The BLM rightly made those stockwater right filings on waters appurtenant to the public land. The BLM stockwater claims were made in behalf of, and for the benefit of, those of us who are permitted to graze livestock on BLM ground. By making those water claims the BLM also saved me money, time, and effort.

I do not wish to be involved in legal maneuvering in my grazing areas. The Shoshone BLM people have worked well with our ranch for many years and I appreciate that. I have no dispute with them about water rights or any other issues concerning our grazing lands. I asked them for a list of all the BLM water right claims for stockwater in the grazing allotments where I plan to continue to run livestock and I have included that list as part of this letter. Again, I ask that you immediately withdraw your objections for each of the water right numbers shown on that lists and that you provide me documented written proof that you have complied with this Request.

Sincerely,

A handwritten signature in black ink, appearing to read "L. N. Purdy".

L. N. (Bud) Purdy

cc: IDWR, BLM, U.S. Dept of Interior, U.S. Dept of Justice, Snake River Adjudication Court

**Picabo Livestock Company Grazing Allotments
With Public Land Water Right Claims For Stockwater
Made By The United States, Department of Interior,
Bureau Of Land Management**

TIMBER GULCH ALLOTMENT, No. 80209

37-14482
37-17321

KENT CANYON ALLOTMENT, No. 80214

37-14584	37-14596	37-14645
37-14585	37-14598	37-14652
37-14587	37-14633	37-14653
37-14588	37-14634	37-14654
37-14589	37-14635	37-16621
37-14590	37-14637	37-16623
37-14591	37-14640	37-16635
37-14592	37-14641	37-16637
37-14594	37-14643	37-16891

POISON CREEK ALLOTMENT, No. 80215

37-02927	37-14706	37-16647
37-07961	37-14709	37-17304
37-14683	37-14713	37-17305
37-14687	37-14718	37-17362
37-14691	37-14720	37-17363
37-14692	37-14721	37-17364
37-14694	37-14731	37-17366
37-14695	37-14734	37-20146
37-14704	37-16645	

SCATTERED TRACTS ALLOTMENT, No. 80239

37-14630	37-14665
37-14632	37-16926
37-14633	37-16931
37-14647	

PICARO ALLOTMENT, No. 80601

37-02873	37-15826	37-20121
37-02990	37-15840	37-20126
37-03019	37-15841	37-20128
37-03043	37-15846	37-20136
37-03107	37-15847	37-20139
37-03117	37-16531	37-20214
37-03137	37-20080	37-20264

TIMMERMAN HILLS ALLOTMENT, No. 80605

37-03020	37-14344	37-15105	37-16517
37-03067	37-14345	37-15113	37-16707
37-07968	37-15067	37-15126	37-16721
37-08026	37-15068	37-15127	37-17203
37-08027	37-15069	37-15131	37-17290
37-08028	37-15093	37-15160	37-20084
37-08029	37-15098	37-15172	37-20167
37-08030	37-15102	37-15549	

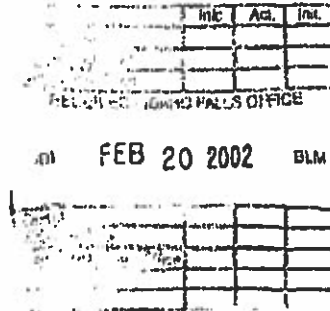
LEDUC CANYON ALLOTMENT, No. 80612

37-03117
37-20128

Exhibit 2

FEB 20 '02 01:01PM BLM IDAHO FALLS

P.2



February 6, 2002

Mr. Norman M. Semanko
Baker, Rosholt & Simpson, LLP
P. O. Box 2139
Boise, Idaho 83701-2139

Dear Mr. Semanko:

**WITHDRAWAL OF OBJECTIONS TO FEDERAL STOCK WATER CLAIMS IN OUR
BLM GRAZING ALLOTMENTS**

It has come to our attention that you have filed objections to four federal stock water claims in Water Basin 33. We are asking that you withdraw all of your objections to the BLM water claims on BLM land in our Squaw Creek, Bell Mountain, Uncle Ike and Warm Springs allotments.

We have had a good working relationship with the Bureau of Land Management with regards to stock water claims for many years, and we see no reason to change our current arrangement. The current federal stock water claims arrangement is efficient and saves us the time and effort that would be required to handle our own claims.

The following page contains a detailed list of water rights that we are requesting to be withdrawn from your objection.

Sincerely,

James Andreason

Daryl Andreason

Exhibit 2

Rocky Ross

Craig Murdock

Murdock Farms

Keith Waymire

cc: Idaho Department of Water Resources, Bureau of Land Management, U. S.
Department of Interior, U. S. Department of Justice, Snake River Adjudication Court

FEB 20 '02 01:01PM BLM IDAHO FALLS

P.3

- 2 -

February 6, 2002

Little Lost River Permittees Grazing Allotments
With Public Land Water Right Claims For Stock Water
Made By The Bureau Of Land Management

Squaw Creek Allotment, No. 02011

33-07070
(3303488021)

Bell Mountain Allotment, No. 02015

33-07125
(3303488030)

Uncle Ike Allotment, No. 02006

33-07095
(3303488028)

Exhibit 2

Warm Springs, No. 02012

33-02145
(3303488003)

BERT L. & DORIS F. HATCH
BC 62 BOX 2160
MAY, IDAHO 83253-9603
(208) 876-4422

Feb. 8 2002

Mr. Norman M. Semanko
Barker, Rosholt & Simpson, LLP
P.O. Box 2139
Boise, Idaho 83701-2139

Re: Withdrawal of objections to Federal stockwater claims in my BLM grazing allotments.

Dear Mr. Semanko,


We understand that you filed objections to all BLM stockwater claims in Water Basin 33. By this letter we request that you immediately withdraw all your objections to all water on Federal lands within our grazing allotments. We do not wish to be involved in legal maneuvering in these areas. We ask that you immediately withdraw your objections for each of the water right numbers listed below and you provide us with documented written proof that you have complied with this request.

SUMMIT CREEK ALLOTMENT
33-02146
33-10660
33-10646
33-10670
33-10811
33-10924
33-10927
33-10928

DONKEY HILLS ALLOTMENT
33-10924
33-10925
33-10926

Exhibit 2

Sincerely,



Bert L. Hatch

APR-28-2006 FRI 02:56 PM BLM IDAHO FALLS/DO

FAX NO. 208 524 7505

P. 24

Kirk Webb & Tom Webb
1742 E. 2900 S.
Wendell, Id 83355

January 8, 2002

Mr. Norman M. Semanko
Barker, Rosholt & Simpson, LLP
P.O. Box 2139
Boise, Idaho 83701-2139

Re: Withdrawal of objections to federal stockwater claims in our Forest Service grazing allotments.

Dear Mr. Semanko

We understand that you filed objections to all Forest Service stockwater claims in Water Basin 37. Those objections were filed on behalf of your clients whose livestock operations are headquartered and located entirely south of the Snake River. By this letter we are requesting that you immediately withdraw all your objections to all Forest Service water claims on public land within our grazing allotments. We do not wish to be involved in legal maneuvering in our grazing areas. We ask that you immediately withdraw your objections for each of the water right numbers shown on the list and that you provide us documented written proof that you have complied with this request.

Sincerely, *Kirk Webb* Exhibit 2

Tom Webb

Forest Service water rights claim #s.

- | | |
|----------|----------|
| 37-13643 | 37-13651 |
| 37-13652 | 37-13675 |
| 37-13676 | 37-13682 |
| 37-13693 | 37-13696 |
| 37-13697 | 37-13698 |
| 37-13709 | 37-13700 |
| 37-13701 | 37-13702 |
| 37-13705 | 37-13719 |
| 37-19855 | 37-19856 |
| 37-19873 | 37-19876 |
| 37-19905 | 37-19933 |
| 37-19934 | |

IDWR, U.S. Dept. of Interior, U.S. Dept. of Justice, Snake River Adjudication Court

APR-28-2006 FRI 02:53 PM BLM IDAHO FALLS/DO

FAX NO. 208 524 7505

P. 06

Pass Creek Cattle Association
C/O Harry Crawford
3384 W 3800 N
Moore, Idaho 83255

February 27, 2002

Mr. Norman M. Semanko
Barker, Rosholt & Simpson, LLP
P.O. Box 2139
Boise, Idaho 83701-2139

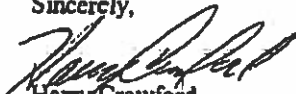
	INC	ADJ	INN
RECEIVED - IDAHO FALLS OFFICE			
	MAR 12 2002		BLM

Re: Withdrawal of objection to federal stockwater claim in our BLM grazing allotment.

Dear Mr. Semanko

We understand that you filed objections to various stockwater claims in Water Basins 37 and 34. One of these claims is on our BLM grazing allotment. Since this objection was filed for your clients whose operations are located south of the Snake River and who have no dealings on our allotment, we are requesting that you immediately withdraw all your objections to our BLM stockwater right #33-07070 (3303488021). This water right was legally filed and approved without objection with the Idaho Department of Water Resources, by the BLM. Please immediately send us at the above address written documented proof that you have withdrawn your objection to this stockwater right.

Sincerely,



Harry Crawford
Secretary

Exhibit 2

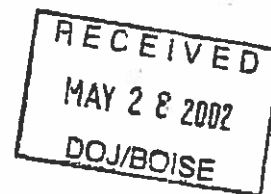
Cc: IDWR, BLM, U.S. Department of Interior, U.S. Department of Justice, Snake River Adjudication Court

MAY-01-06 06:57 FROM: CACI INC

ID: 208 387 0642

PAGE 2/5

Lava Lake Land & Livestock, LA
3485 Sacramento Street
San Francisco, California 94118
(415) 292-1764
FAX: (415) 292-1766



May 16, 2002

Mr. Norman M. Semanko
Barker, Rosholt & Simpson, LLP
P.O. Box 2139
Boise, Idaho 83701-2139

37-02816

Re: Withdrawal of objections to federal stockwater claims in Lava Lake's BLM grazing allotments

Dear Mr. Semanko:

I understand that you have filed objections to all BLM stockwater claims in Water Basin 37. These objections were filed on behalf of your clients whose livestock operations are headquartered and located entirely south of the Snake River. I am not aware that any of your clients run livestock on land managed by the Shoshone BLM Office and I am confident that none of them have grazing privileges in any of the allotments in which we operate.

I request that you withdraw all your objections to all BLM water claims on public land within my grazing allotments. The BLM rightly made those stockwater right filings on waters appurtenant to public land. The BLM stockwater claims were on behalf of, and for the benefit of, those of us who are permitted to graze livestock on BLM ground. By making those water claims the BLM also saves me money, time and effort.

Exhibit 2

I do not wish to be involved in legal maneuvering in my allotments. The Shoshone BLM professionals are working constructively with Lava Lake. They have worked vigorously to transfer AUMs relating to numerous recent transactions and their responsiveness in other matters has been commendable. I have no dispute with them about water rights nor am I aware of any other points of disagreement between Lava Lake and BLM concerning our grazing lands. I have asked them for a list of the BLM water right claims for stockwater in the allotments where we currently have grazing privileges and to which you object and I have included that list with this letter. Again, I ask that you withdraw your objections for each of the water rights identified numerically on that list.

Sincerely,

A handwritten signature in cursive script that reads "Brian S. Bean".

Brian S. Bean

cc: IDWR, BLM, U.S. Department of Justice, Snake River Basin Adjudication Court
Office of Idaho Attorney General (2)

enclosure

**Lava Lake Land & Livestock Grazing Allotments
With Public Land Water Right Claims For Stockwater
Made By The United States, Department of Interior,
Bureau of Land Management**

KENT CANYON ALLOTMENT, No. 80214

37-16633

UPPER ROCK CREEK ALLOTMENT, No. 80219

37-03101	37-14946	37-14952	37-14962	37-16508
37-07975	37-14947	37-14954	37-14965	37-16665
37-14931	37-14949	37-14955	37-14966	37-16667
37-14943	37-14950	37-14959	37-14984	37-17212
37-14945	37-14951	37-14961	37-14987	37-17215

SOUTH EAST FORK ALLOTMENT, No. 80227

37-15250	37-15253	37-17053
37-15252	37-15254	37-17054

INDIAN CREEK ALLOTMENT, No. 80228

Exhibit 2

37-14819	37-15258	37-16655	37-19165
37-14832	37-16653	37-17082	37-20140

QUIGLEY ALLOTMENT, No. 80229

37-14842	37-15285	37-16737	37-20036	37-20039
37-14852	37-15286	37-17103	37-20037	37-20040
37-15275	37-15289	37-20035	37-20038	37-20041

UPPER SLAUGHTERHOUSE ALLOTMENT, No. 80232

37-15299
37-15300
37-15301
37-20043

WEST FORK FISH CREEK ALLOTMENT, No. 80321

37-16086
37-16087
37-16108
37-20064

UPPER FISH CREEK ALLOTMENT, No. 80332

37-16252
37-16253
37-16254
37-16885

IRON MINE ALLOTMENT, No. 80333

37-16255	37-16291	37-16837	37-17061
37-16256	37-16296	37-16839	37-17169
37-16257	37-16315	37-16843	37-17170
37-16258	37-16317	37-16845	37-20053
37-16265	37-16547	37-16847	37-20160
37-16266	37-16835	37-16849	37-20161
37-16267			
37-16269			
37-16273			
37-16274			
37-16275		Exhibit 2	
37-16286			

LAVA LAKE ALLOTMENT, No. 80334

37-16323	37-16332	37-16345	37-16375	37-17065
37-16325	37-16333	37-16347	37-16423	37-17070
37-16326	37-16335	37-16349	37-17063	37-20059
37-16327				

COTTONWOOD ALLOTMENT, No. 80335

37-16300	37-16331	37-16438	37-16447	37-17062
37-16305	37-16367	37-16440	37-16449	37-17067
37-16306	37-16431	37-16442	37-16460	37-17068
37-16308	37-16433	37-16444	37-16461	37-17069
37-16328	37-16434	37-16445	37-16466	37-20055
37-16330	37-16436	37-16446	37-17002	37-20058

RICHFIELD ALLOTMENT, No. 80603

37-03068
37-03070
37-04205
37-15173
37-20166

TIMMERMAN HILLS ALLOTMENT, No. 80605

37-15107

LIDLAW PARK ALLOTMENT, No. 80706

37-02835
37-03088
37-03096
37-07966
37-07972

Exhibit 2

WILDHORSE ALLOTMENT, No. 80711

37-02816	37-02861	37-03097	37-15865	37-20154
37-02819	37-02862	37-03115	37-15866	37-20155
37-02822	37-02863	37-03116	37-15867	37-20159
37-02828	37-02883	37-04214	37-17309	37-20162
37-02857	37-02905	37-04216	37-17310	37-20168
37-02858	37-02972	37-07970	37-17311	37-20169
37-02859	37-03093	37-07974	37-17312	
37-02860	37-03094	37-15864	37-20153	

KIMAMA ALLOTMENT, No. 80713

37-02902

EXHIBIT 3

DECLARATION OF FREDRIC W. PRICE

United States of America v. State of Idaho et al.
Case No. 1:22-cv-00236-DCN



Names of Parties Serving Document:

UNITED STATES OF AMERICA

SEE ATTACHMENT #1

Attorneys' Names and Addresses:

THOMAS L. SANSONETTI
United States Department of Justice
Assistant Attorney General
Environment and Natural Resources Division

NORMAN M. SEMANKO
TRAVIS L. THOMPSON
Barker Rosholt & Simpson LLP
205 N. 10th Street, Suite 520
P.O. Box 2139
Boise, Idaho 83701-2139
(208) 336-0700
ISB # 4761 (NMS)
ISB # 6168 (TLT)

DAVID L. NEGRI
LARRY A. BROWN
United States Department of Justice
Environment and Natural Resources Division
General Litigation Section
550 West Fort Street, MSC 033
Boise, Idaho 83724
(208) 331-5943

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

In Re SRBA) Subcase Numbers: See Exhibit A, B, C,
) and E
)
Case No. 39576) **STIPULATION AND JOINT MOTION**
) **FOR ORDER APPROVING**
) **STIPULATION**

DESCRIPTIVE SUMMARY

This document is the Stipulation and Joint Motion for Order Approving Stipulation, filed by the United States of America (“United States”) and the private parties listed on Attachment #1 (“Private Parties”).

STIPULATION

The United States and the Private Parties (collectively “Parties”), by and through their respective undersigned counsel, hereby stipulate and agree as follows as to the water right numbers listed on Exhibits A, B, C, D, E, and F, and the water right claims to be filed in the grazing allotments listed on Exhibit G (individually, “Water Right” or, collectively, “Water Rights”):

1. WITHDRAWAL OF OBJECTIONS AND RESPONSES BY PRIVATE PARTIES.

The Private Parties agree to dismiss with prejudice their objections and responses to the Water Rights listed on Exhibit A. The Parties agree and stipulate that the elements of each Water Right listed on Exhibit A should be decreed as described in Section 5, below.

The Private Parties agree to dismiss with prejudice their objections and responses to the Water Rights listed on Exhibit B, and to withdraw any motions or court filings which attempt to set aside partial decrees for stockwater rights held by the United States, as listed in Exhibit C. The Private Parties further agree that they will not challenge any other partial decree issued to the United States in the SRBA for stockwater purposes.

2. WITHDRAWAL OF OBJECTIONS BY UNITED STATES.

The United States agrees to dismiss with prejudice its objections to the Water Rights listed on Exhibit E. The Parties agree and stipulate that the elements of each Water Right listed on Exhibit E should be decreed as described in Section 5, below.

3. CLAIMS NOT YET REPORTED.

The Parties have a number of pending stockwater claims that have not yet been reported by IDWR (“unreported claims”). Such unreported claims

are listed on Exhibits D and F. The Parties agree and stipulate that the elements of the unreported claims should be decreed as described in Section 5, below. The Parties agree that they will not file objections or responses to the entry of partial decrees for the claims listed on Exhibit D and F if the elements of such claims conform to the provisions described in this Stipulation.

4. CLAIMS NOT YET FILED. The Private Parties have a number of stockwater claims that have not yet been filed with IDWR ("unfiled claims"). The name of the claimant and the grazing allotments in which these unfiled claims are located are listed on Exhibit G.

Notwithstanding the provisions of Section 8 below, the Parties agree that they will not oppose the filing of the claims so long as they are made by the claimants and within the allotments identified in Exhibit G. Moreover, although the United States retains the right to file objections to individual elements of the claimed water right in order to ensure compliance with this Stipulation and to ensure consistency with the overlapping or competing claims of the United States, it will not object to the claims on the basis that they contain points of diversion or places of use on federal lands and it will not object to the priority date or the purpose of use so long as those elements conform to the provisions described in this Stipulation. In addition, the Parties agree that such claims shall be filed no later than December 31, 2002, and that in no event shall any stockwater claims be filed in the SRBA on the federal lands underlying the grazing allotments listed on Exhibit G after such date except by agreement between the United States and any affected Private Parties.

5. WATER RIGHT DESCRIPTIONS. The Parties agree and stipulate that the water right claims listed on Exhibits A, D, E, and F, and the water right claims to be filed pursuant to Section 4 above, shall be decreed consistent with the following:

A. Priority Dates.

- i. Claims for which the United States has not yet received a partial decree. If the United States has not yet received a partial decree for a water right claim, the following shall apply. For claims on lands administered by the Bureau of Land Management, the United States shall receive a water right with a priority date which is the later of a) the claimed priority date or b) June 28, 1934. For claims on lands administered by the Forest Service, the United States shall receive a water right with a priority date which is the later of a) the claimed priority date or b) the date of the federal reservation of such lands. On Forest Service lands, the federal reservation date for claims on what is presently the Sawtooth National Forest is June 12, 1905, and the federal reservation date for claims on what is presently the Nez Perce National Forest is May 10, 1906. The overlapping or competing claims of the Private Parties shall have a priority date that is one-day senior to the United States' priority date, unless the Private Parties can provide a patent or deed for their "base property," as such term is defined in 36 C.F.R. § 222.1 and 43 C.F.R. § 4100.0-5, that precedes this date, in which case the Private Parties shall receive a priority date that is this more senior date.
- ii. Claims for which the United States has received a partial decree for an undeveloped source. If the United States has received a partial decree for a water

right claim and the source is undeveloped (*i.e.*, instream or an undeveloped spring), the Private Parties' water rights shall be decreed as described in the last sentence of section 5A(i) above.

iii. Claims for which the United States has received a partial decree for a developed source. If the United States has received a partial decree for a water right claim and the source is developed, the overlapping or competing claims of the Private Parties shall have a priority date that is one-day junior to that of the United States' priority date as described in the decree. However, if the Private Parties can provide 1) evidence of stockwatering use of the water source preceding the priority date of the United States' decree, and 2) a patent or deed for their "base property," as such term is defined in 36 C.F.R. § 222.1 and 43 C.F.R. § 4100.0-5, that is at least as senior as the water use date, the Private Parties' priority date shall be the water use date. Moreover, if the priority date of the United States' decree is based on beneficial use and such date significantly predates the date of the development, the overlapping or competing claims of the Private Parties shall have a priority date that is one-day senior to that of the United States' priority date.

iv. Claims for which the United States has a Public Water Reserve 107 reservation. If the United States has a claim or a decree for a spring under Public Water Reserve 107 ("PWR 107"), the overlapping or competing claims of the Private Parties shall have a priority date that is one-day junior to that of the United States' priority date, unless the Private Parties can provide 1) evidence of

stockwatering use of the water source preceding the United States' priority date, and 2) complete chain-of- title documentation for their "base property," as such term is defined in 36 C.F.R. § 222.1 and 43 C.F.R. § 4100.0-5, that is at least as senior as the water use date, in which case the Private Parties' priority date shall be the water use date.

- B. Purpose and Place of Use of Water Rights. The Parties agree that the purpose of use of the Water Rights listed on Exhibit E and Exhibit F, and the water right claims to be filed pursuant to Section 4 above, is only for the watering of livestock lawfully within a permitted federal grazing allotment and that the number of livestock within the allotment shall not exceed the amount authorized by a federal grazing permit. The Parties agree that the purpose of use of the state-law based Water Rights listed on Exhibits A, C and D is only for the watering of livestock lawfully within a permitted federal grazing allotment. The Parties further agree that the place of use of the state-law based Water Rights listed on Exhibits A, C, D, E and F, and the water right claims to be filed pursuant to Section 4 above, shall remain *in situ*.

6. CONFORMING DOCUMENTS. The Parties agree that they will execute and file any necessary documents with the SRBA Court and IDWR to conform the elements of the claims listed on Exhibits A, D, E, and F, and the water right claims to be filed pursuant to Section 4 above, to the provisions described in this Stipulation.

7. GRAZING PERMITS AND MANAGEMENT OF FEDERAL LANDS. The Parties agree that the Water Rights listed on Exhibits A, C, D, E and F, and the water right claims to be

filed pursuant to Section 4 above, shall not alter the rights of a permittee under a valid grazing permit nor impede the authority of the United States to manage federal lands.

8. NO FURTHER CLAIMS. The Private Parties agree that they will not file additional claims in the SRBA for water rights where the place of use or point of diversion is located on federal lands and the United States agrees that it will not file additional claims in the SRBA for water rights where the place of use or point of diversion is located on federal lands underlying the federal Grazing Allotments on which any of the Private Parties are grazing permittees, except by agreement between the United States and any affected Private Parties. This paragraph shall not affect or apply to any claims already filed in the SRBA by any Party as of the effective date of this Stipulation, nor shall it apply to the claims to be filed pursuant to Section 4 above.

9. APPROVAL OF STIPULATION AND ISSUANCE OF PARTIAL AND FINAL DECREES BY COURT. The Parties agree to support the Joint Motion for Order Approving Stipulation set forth below. If for any reason the Court does not approve the Stipulation and issue partial and final decrees for any of the Water Rights on the attached Exhibits pursuant to the terms of this Stipulation, this Stipulation is null and void and shall have no effect, and the Parties shall proceed with a determination of their water rights and/or objections under applicable law.

10. STIPULATION NOT TO BE USED AGAINST THE PARTIES. The Parties agree that this Stipulation has been entered into based upon good faith negotiations for the purpose of resolving legal disputes, including pending litigation, by compromise and settlement and that nothing in this Stipulation, or any offers or compromises made in the course of negotiating this Stipulation, shall be construed as admissions against interest or tendered or used as evidence to

show the validity or invalidity of any water right claims made by the Parties, or as an admission or concession of wrongdoing or liability, or shall be used in any manner by any party in the SRBA in any future proceedings in the SRBA, in any appellate proceedings concerning the SRBA, or in any other proceeding, other than those seeking approval of this Stipulation by the SRBA Court, for interpretation or enforcement of this Stipulation, or for a purpose contemplated by Idaho Rule of Evidence 408.

11. RESERVATIONS. The Parties agree that this Stipulation has been entered into based upon good faith negotiations for the purpose of resolving legal disputes, including pending litigation, by compromise and settlement and that nothing herein shall be construed as precedent in any other proceeding or context. Nothing in this Stipulation shall be construed to deprive any federal official of authority to revise, amend, or promulgate regulations. Nothing in this Stipulation shall be construed to commit any federal official to expend funds not appropriated by Congress.

12. VOLUNTARY EXECUTION. This Stipulation was entered into and executed voluntarily by the Parties in good faith, and without any fraud, misunderstanding, overreaching, misrepresentation, duress, or undue influence.

13. BINDING EFFECT. This Stipulation shall be binding on any and all successors, assigns, heirs, executors, and administrators of each of the Parties.

14. COSTS AND ATTORNEY FEES. Each Party shall bear their own costs and attorney fees.

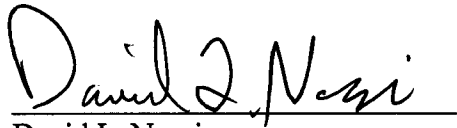
15. EFFECTIVE DATE. This Stipulation shall become effective upon execution by all of the Parties.

JOINT MOTION FOR ORDER APPROVING STIPULATION

The United States and the Private Parties request the Court to approve the foregoing Stipulation. The Order sought by this motion is fully in accordance with Idaho law. Such an Order would serve not only to facilitate the settlement between the United States and the Private Parties, thus streamlining the process, but would very likely have the effect of encouraging future settlements in the SRBA. The provisions of Idaho Rule of Evidence 408, as well as the policy underlying that rule and the policy of the SRBA Court, are directed at furthering the strong public policy favoring out-of-court settlement of disputes over litigation.

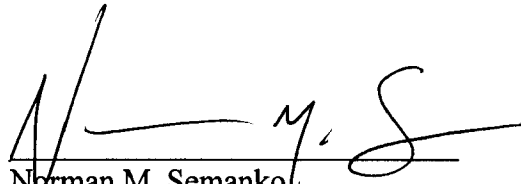
Wherefore, the United States and the Private Parties respectfully request that this Court grant this motion in all respects. The United States and the Private Parties further request oral argument and expedited consideration of this matter.

DATED this 28th day of August, 2002.



David L. Negri
Larry A. Brown
United States Department of Justice

Attorneys for the United States of America



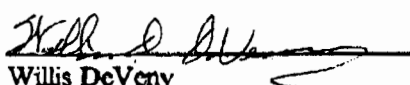
Norman M. Semanko
Travis L. Thompson
Barker, Rosholt & Simpson LLP

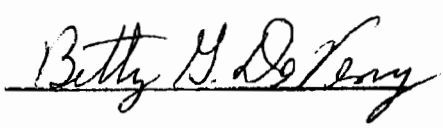
Attorneys for the following Parties:

Western Stockgrowers Association et al.
Broken Diamond Ranch
Brown, Birchie
Brown, Wallace
Butler, Raymond
Crockett, David
Kinsey Family LLP
Kunkel, Tom
Mathers Ranch
Tugaw Ranches
Williams, Inc.
Williams Properties LLC
William J & Thomas Williams

A.L. Cattle, Inc.
Bedke Family Limited Partnership
Bedke, Scott
Bedke, Karl U.
Bedke, Ray C.
Bowen, Todd
Branch, Weldon
Crater Butte Cattle Association
Diamond A Livestock, Inc.
DeVeny, Willis
DeVeny, Betty
Eckhardt Family Limited Partnership
Eckhardt, James
Eckhardt, Nellie
Faulkner Land & Livestock Company
Flying Triangle Inc.

Gardner, Luther
 Lawrence Ranch Inc.
 Lawrence, Ron
 Layton, Eugene
 Mathews, Bill J.
 Mathews, Eugene
 Pickett Ranch and Sheep Company
 Poulton, Michael
 Poulton, Gary
 Richfield Cattle Association
 Shingle Creek LLC
 Shoulder Three Ranches Inc.
 Tugaw, Joe
 Warr, Keith
 Whiteley, Winslow
 Winecup, Inc.

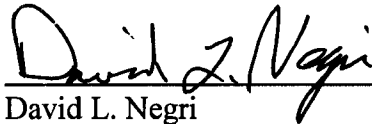

 Willis DeVeny


 Betty DeVeny

State of Idaho)
) ss.
County of Ada)

DAVID L. NEGRI, duly sworn, upon oath, deposes and says:

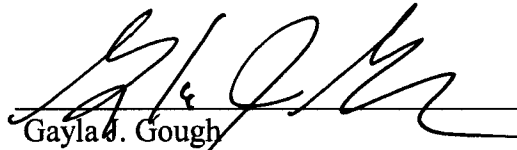
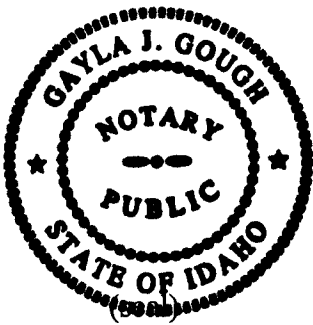
That I am the party filing this Stipulation, and/or that I am the attorney for the party, and that I have read this Stipulation, know its contents and believe that the statements are true to the best of my knowledge.



David L. Negri
United States Department of Justice
Environment and Natural Resources Division
General Litigation Section
550 West Fort Street, MSC 033
Boise, Idaho 83724
(208) 331-5943

Counsel for the United States of America

Subscribed and sworn before me on: Aug 28, 2002



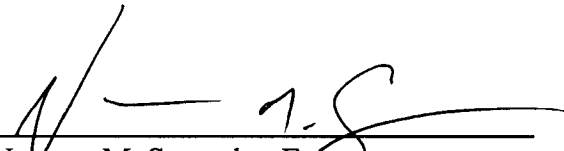
Notary Public for: Gayla J. Gough
Residing at: Idaho
Commission expires: Kuna, Idaho
11-17-2004

State of Idaho)
) ss.
County of Ada)

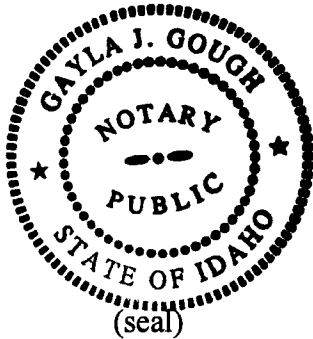
NORMAN M. SEMANKO, duly sworn, upon oath, deposes and says:

That I am the party filing this Stipulation, and/or that I am the attorney for the party, and that I have read this Stipulation, know its contents and believe that the statements are true to the best of my knowledge.

Dated 8/28/02


Norman M. Semanko, Esq.
Barker Rosholt & Simpson LLP
205 N. 10th Street, Suite 520
P.O. Box 2139
Boise, Idaho 83701-2139
Counsel for the Private Parties

Subscribed and sworn before me on: Aug 28, 2002



GAYLA J. GOUGH
(name of notary)

Notary Public for: Idaho
Residing at: KUNA IDAHO
Commission expires: 11-17-2004

State of Idaho)
) ss.
County of Idaho)

WILLIS DEVENY and BETTY DEVENY, duly sworn, upon oath, deposes and says:

That we are the parties filing this Stipulation, and that we have read this Stipulation, know its contents and believe that the statements are true to the best of our knowledge.

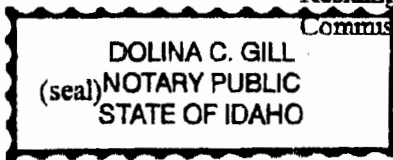
Dated Aug 27 2002

Willis E. DeVeny
Willis DeVeny
P.O. Box 1160
Riggins, Idaho 83549

Subscribed and sworn before me on: Aug 27 2002

Dolina C. Gill
(name of notary)

Notary Public for: Idaho
Residing at: Riggins
Commission expires: 1-18-2006

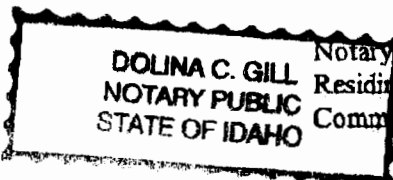


Betty G. DeVeny
Betty DeVeny
P.O. Box 1160
Riggins, Idaho 83549

Subscribed and sworn before me on: Aug 27, 2002

Dolina C. Gill
(name of notary)

Notary Public for: Idaho
Residing at: Riggins
Commission expires: 1-18-2006



(seal)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of August, 2002, I served a true and correct copy of the foregoing **STIPULATION AND JOINT MOTION FOR ORDER APPROVING STIPULATION**, by depositing a copy thereof in the U.S. mail, postage prepaid, or by other service where indicated, upon the following:

Original to:

BY OVERNIGHT DELIVERY:
Clerk of the Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

Copies to:

U.S. Department of Justice
General Litigation Section
Environment and Natural Resource Division
550 West Fort Street, MSC 033
Boise, ID 83724

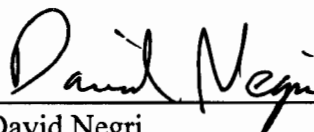
Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, ID 83711-4449

IDWR Document Depository
P.O. Box 83720
Boise, ID 83720-0098

David J. Barber, Deputy Attorney General
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, ID 83711-4449

BY HAND DELIVERY:
Norman M. Semanko, Esq.
Travis L. Thompson
Barker Rosholt & Simpson LLP
205 N. 10th Street, Suite 520
P.O. Box 2139
Boise, Idaho 83701-2139

Willis & Betty DeVeny
P.O. Box 1160
Riggins, Idaho 83549



David Negri

Attachment 1
Claimants/Objectors/Respondents

Western Stockgrowers Association et al.
Broken Diamond Ranch
Brown, Birchie
Brown, Wallace
Butler, Raymond
Crockett, David
Kinsey Family LLP
Kunkel, Tom
Mathers Ranch
Tugaw Ranches
Williams, Inc.
Williams Properties LLC
William J & Thomas Williams

Richfield Cattle Association
Shingle Creek LLC
Shoulder Three Ranches Inc.
Tugaw, Joe
Warr, Keith
Whiteley, Winslow
Winecup, Inc.

A.L. Cattle, Inc.
Bedke Family Limited Partnership
Bedke, Scott
Bedke, Karl U.
Bedke, Ray C.
Bowen, Todd
Branch, Weldon
Crater Butte Cattle Association
DeVeny, Willis
DeVeny, Betty
Diamond A Livestock, Inc.
Eckhardt Family Limited Partnership
Eckhardt, James
Eckhardt, Nellie
Faulkner Land & Livestock Company
Flying Triangle Inc.
Gardner, Luther
Lawrence Ranch Inc.
Lawrence, Ron
Layton, Eugene
Mathews, Bill J.
Mathews, Eugene
Pickett Ranch and Sheep Company
Poulton, Michael
Poulton, Gary

EXHIBIT A
U.S. Claims on Permittees' Allotments

<u>BASIN 37</u>	37-02945 BLM	37-03085 BLM	37-04224 BLM
	37-02949 BLM	37-03086 BLM	37-07128 BLM
37-02809 BLM	37-02950 BLM	37-03111 BLM	37-07129 BLM
37-02811 BLM	37-02951 BLM	37-03113 BLM	37-07131 BLM
37-02813 BLM	37-02954 BLM	37-03118 BLM	37-07132 BLM
37-02817 BLM	37-02956 BLM	37-03119 BLM	37-07317 BLM
37-02821 BLM	37-02959 BLM	37-03122 BLM	37-07969 BLM
37-02830 BLM	37-02966 BLM	37-03123 BLM	37-07982 BLM
37-02836 BLM	37-02968 BLM	37-03124 BLM	37-08017 BLM
37-02837 BLM	37-02975 BLM	37-03125 BLM	37-08018 BLM
37-02848 BLM	37-02976 BLM	37-03127 BLM	37-08019 BLM
37-02851 BLM	37-02977 BLM	37-03128 BLM	37-08020 BLM
37-02852 BLM	37-02979 BLM	37-03129 BLM	37-08022 BLM
37-02856 BLM	37-02980 BLM	37-03133 BLM	37-08023 BLM
37-02867 BLM	37-02981 BLM	37-03134 BLM	37-08024 BLM
37-02872 BLM	37-02994 BLM	37-03147 BLM	37-08052 BLM
37-02884 BLM	37-03000 BLM	37-03159 BLM	37-08187 BLM
37-02885 BLM	37-03002 BLM	37-04177 BLM	37-08188 BLM
37-02886 BLM	37-03003 BLM	37-04178 BLM	37-08191 BLM
37-02887 BLM	37-03004 BLM	37-04180 BLM	37-08242 BLM
37-02896 BLM	37-03005 BLM	37-04181 BLM	37-08243 BLM
37-02914 BLM	37-03006 BLM	37-04182 BLM	37-08311 BLM
37-02915 BLM	37-03007 BLM	37-04183 BLM	37-08319 BLM
37-02917 BLM	37-03008 BLM	37-04195 BLM	37-10209 BLM
37-02918 BLM	37-03009 BLM	37-04196 BLM	37-14397 BLM
37-02919 BLM	37-03010 BLM	37-04200 BLM	37-14398 BLM
37-02920 BLM	37-03011 BLM	37-04201 BLM	37-14417 BLM
37-02921 BLM	37-03013 BLM	37-04202 BLM	37-14418 BLM
37-02922 BLM	37-03015 BLM	37-04206 BLM	37-14419 BLM
37-02923 BLM	37-03023 BLM	37-04207 BLM	37-14422 BLM
37-02924 BLM	37-03024 BLM	37-04209 BLM	37-14423 BLM
37-02928 BLM	37-03027 BLM	37-04210 BLM	37-14425 BLM
37-02929 BLM	37-03037 BLM	37-04211 BLM	37-14426 BLM
37-02930 BLM	37-03038 BLM	37-04212 BLM	37-14427 BLM
37-02934 BLM	37-03044 BLM	37-04213 BLM	37-14428 BLM
37-02935 BLM	37-03055 BLM	37-04215 BLM	37-14429 BLM
37-02936 BLM	37-03058 BLM	37-04219 BLM	37-14430 BLM
37-02955 BLM	37-03059 BLM	37-04220 BLM	37-14431 BLM
37-02937 BLM	37-03065 BLM	37-04221 BLM	37-14432 BLM
37-02942 BLM	37-03084 BLM	37-04223 BLM	37-14433 BLM

EXHIBIT A
U.S. Claims on Permittees' Allotments

37-14434 BLM	37-17640 BLM	37-18024 BLM	37-18334 BLM
37-14435 BLM	37-17643 BLM	37-18025 BLM	37-18349 BLM
37-14436 BLM	37-17655 BLM	37-18026 BLM	37-18355 BLM
37-14437 BLM	37-17656 BLM	37-18027 BLM	37-18357 BLM
37-14443 BLM	37-17657 BLM	37-18047 BLM	37-18358 BLM
37-14445 BLM	37-17659 BLM	37-18049 BLM	37-18359 BLM
37-14447 BLM	37-17660 BLM	37-18050 BLM	37-18360 BLM
37-14449 BLM	37-17672 BLM	37-18051 BLM	37-18460 BLM
37-14454 BLM	37-17673 BLM	37-18062 BLM	37-18461 BLM
37-14455 BLM	37-17676 BLM	37-18069 BLM	37-18462 BLM
37-14456 BLM	37-17677 BLM	37-18071 BLM	37-18463 BLM
37-14457 BLM	37-17679 BLM	37-18072 BLM	37-18464 BLM
37-14458 BLM	37-17680 BLM	37-18083 BLM	37-18480 BLM
37-14460 BLM	37-17681 BLM	37-18084 BLM	37-18483 BLM
37-14461 BLM	37-17684 BLM	37-18085 BLM	37-18485 BLM
37-14466 BLM	37-17687 BLM	37-18086 BLM	37-18486 BLM
37-15169 BLM	37-17688 BLM	37-18087 BLM	37-18487 BLM
37-15186 BLM	37-17692 BLM	37-18088 BLM	37-18488 BLM
37-16481 BLM	37-17693 BLM	37-18091 BLM	37-18489 BLM
37-16557 BLM	37-17694 BLM	37-18092 BLM	37-18490 BLM
37-16894 BLM	37-17696 BLM	37-18093 BLM	37-18491 BLM
37-17222 BLM	37-17702 BLM	37-18102 BLM	37-18492 BLM
37-17223 BLM	37-17703 BLM	37-18103 BLM	37-18512 BLM
37-17225 BLM	37-17704 BLM	37-18117 BLM	37-18513 BLM
37-17226 BLM	37-17705 BLM	37-18119 BLM	37-18516 BLM
37-17286 BLM	37-17706 BLM	37-18129 BLM	37-18518 BLM
37-17326 BLM	37-17717 BLM	37-18135 BLM	37-18519 BLM
37-17327 BLM	37-17720 BLM	37-18136 BLM	37-18522 BLM
37-17329 BLM	37-17739 BLM	37-18191 BLM	37-18525 BLM
37-17330 BLM	37-17740 BLM	37-18192 BLM	37-18527 BLM
37-17331 BLM	37-17742 BLM	37-18193 BLM	37-18529 BLM
37-17332 BLM	37-17760 BLM	37-18225 BLM	37-18532 BLM
37-17396 BLM	37-17979 BLM	37-18226 BLM	37-18533 BLM
37-17616 BLM	37-17984 BLM	37-18228 BLM	37-18534 BLM
37-17618 BLM	37-18006 BLM	37-18230 BLM	37-18535 BLM
37-17621 BLM	37-18008 BLM	37-18260 BLM	37-18536 BLM
37-17622 BLM	37-18009 BLM	37-18261 BLM	37-18543 BLM
37-17623 BLM	37-18017 BLM	37-18262 BLM	37-18545 BLM
37-17633 BLM	37-18020 BLM	37-18302 BLM	37-18547 BLM
37-17639 BLM	37-18022 BLM	37-18303 BLM	37-18551 BLM

EXHIBIT A
U.S. Claims on Permittees' Allotments

37-18552 BLM	37-18745 BLM	37-18897 BLM	37-19488 BLM
37-18553 BLM	37-18746 BLM	37-18900 BLM	37-19489 BLM
37-18563 BLM	37-18747 BLM	37-18901 BLM	37-19490 BLM
37-18565 BLM	37-18763 BLM	37-18902 BLM	37-19497 BLM
37-18571 BLM	37-18765 BLM	37-18905 BLM	37-19498 BLM
37-18572 BLM	37-18766 BLM	37-18907 BLM	37-19499 BLM
37-18574 BLM	37-18786 BLM	37-18909 BLM	37-19515 BLM
37-18575 BLM	37-18787 BLM	37-18911 BLM	37-19518 BLM
37-18576 BLM	37-18789 BLM	37-18912 BLM	37-19519 BLM
37-18577 BLM	37-18790 BLM	37-18946 BLM	37-19520 BLM
37-18578 BLM	37-18791 BLM	37-18962 BLM	37-19521 BLM
37-18579 BLM	37-18792 BLM	37-18967 BLM	37-19524 BLM
37-18580 BLM	37-18806 BLM	37-18968 BLM	37-19525 BLM
37-18588 BLM	37-18814 BLM	37-18969 BLM	37-19530 BLM
37-18590 BLM	37-18818 BLM	37-18974 BLM	37-19531 BLM
37-18594 BLM	37-18822 BLM	37-19090 BLM	37-19532 BLM
37-18595 BLM	37-18824 BLM	37-19107 BLM	37-19533 BLM
37-18604 BLM	37-18826 BLM	37-19164 BLM	37-19534 BLM
37-18609 BLM	37-18827 BLM	37-19165 BLM	37-19535 BLM
37-18613 BLM	37-18833 BLM	37-19167 BLM	37-19536 BLM
37-18614 BLM	37-18835 BLM	37-19185 BLM	37-19538 BLM
37-18629 BLM	37-18840 BLM	37-19187 BLM	37-19539 BLM
37-18630 BLM	37-18845 BLM	37-19205 BLM	37-19540 BLM
37-18631 BLM	37-18847 BLM	37-19208 BLM	37-19547 BLM
37-18635 BLM	37-18850 BLM	37-19210 BLM	37-19590 BLM
37-18645 BLM	37-18853 BLM	37-19215 BLM	37-19597 BLM
37-18656 BLM	37-18856 BLM	37-19267 BLM	37-19600 BLM
37-18658 BLM	37-18859 BLM	37-19325 BLM	37-19616 BLM
37-18698 BLM	37-18860 BLM	37-19401 BLM	37-19629 BLM
37-18702 BLM	37-18868 BLM	37-19409 BLM	37-19637 BLM
37-18711 BLM	37-18873 BLM	37-19416 BLM	37-19638 BLM
37-18712 BLM	37-18875 BLM	37-19417 BLM	37-19639 BLM
37-18713 BLM	37-18882 BLM	37-19445 BLM	37-19640 BLM
37-18716 BLM	37-18883 BLM	37-19452 BLM	37-19642 BLM
37-18718 BLM	37-18884 BLM	37-19456 BLM	37-19644 BLM
37-18719 BLM	37-18885 BLM	37-19458 BLM	37-19645 BLM
37-18721 BLM	37-18886 BLM	37-19460 BLM	37-19646 BLM
37-18734 BLM	37-18888 BLM	37-19461 BLM	37-19649 BLM
37-18743 BLM	37-18889 BLM	37-19462 BLM	37-19650 BLM
37-18744 BLM	37-18890 BLM	37-19478 BLM	37-19651 BLM

EXHIBIT A
U.S. Claims on Permittees' Allotments

37-19652 BLM	45-07601 BLM	45-12111 USFS	45-12816 BLM
37-19670 BLM	45-07611 BLM	45-12112 USFS	45-12827 BLM
37-20046 BLM	45-11978 USFS	45-12113 USFS	45-12838 USFS
37-20047 BLM	45-12050 USFS	45-12114 USFS	45-12842 USFS
37-20050 BLM	45-12053 USFS	45-12116 USFS	45-12855 USFS
37-20051 BLM	45-12055 USFS	45-12127 USFS	45-12866 USFS
37-20097 BLM	45-12056 USFS	45-12162 USFS	45-12869 USFS
37-20148 BLM	45-12058 USFS	45-12218 USFS	45-12871 USFS
37-20188 BLM	45-12060 USFS	45-12243 USFS	
37-20189 BLM	45-12061 USFS	45-12280 USFS	
37-20191 BLM	45-12073 USFS	45-12468 BLM	
37-20192 BLM	45-12074 USFS	45-12511 BLM	<u>BASIN 47</u>
37-20207 BLM	45-12075 USFS	45-12521 BLM	47-08043 BLM
37-20209 BLM	45-12076 USFS	45-12524 BLM	47-14994 USFS
37-20212 BLM	45-12079 USFS	45-12525 BLM	47-14995 USFS
37-20220 BLM	45-12080 USFS	45-12526 BLM	47-14997 USFS
37-20221 BLM	45-12081 USFS	45-12541 BLM	47-14999 USFS
37-20224 BLM	45-12082 USFS	45-12543 BLM	47-15001 USFS
37-20230 BLM	45-12083 USFS	45-12545 BLM	47-15002 USFS
37-20231 BLM	45-12084 USFS	45-12549 BLM	47-15004 USFS
37-20233 BLM	45-12085 USFS	45-12550 BLM	47-15005 USFS
37-20234 BLM	45-12086 USFS	45-12551 BLM	47-15010 USFS
37-20235 BLM	45-12087 USFS	45-12557 BLM	47-15028 USFS
37-20236 BLM	45-12088 USFS	45-12560 BLM	47-15031 USFS
37-20237 BLM	45-12089 USFS	45-12613 BLM	47-15033 USFS
37-20252 BLM	45-12090 USFS	45-12654 BLM	47-15035 USFS
37-20259 BLM	45-12091 USFS	45-12656 BLM	47-15037 USFS
37-20261 BLM	45-12092 USFS	45-12658 BLM	47-15038 USFS
	45-12093 USFS	45-12672 BLM	47-15045 USFS
<u>BASIN 45</u>	45-12094 USFS	45-12675 BLM	47-15048 USFS
	45-12096 USFS	45-12676 BLM	47-15051 USFS
45-02769 BLM	45-12097 USFS	45-12677 BLM	47-15052 USFS
45-02778 BLM	45-12098 USFS	45-12678 BLM	47-15054 USFS
45-02789 BLM	45-12099 USFS	45-12682 BLM	47-15055 USFS
45-02817 BLM	45-12101 USFS	45-12690 BLM	47-15056 USFS
45-02819 BLM	45-12105 USFS	45-12728 BLM	47-15058 USFS
45-02823 BLM	45-12106 USFS	45-12730 BLM	47-15060 USFS
45-07343 BLM	45-12107 USFS	45-12779 BLM	47-15061 USFS
45-07488 BLM	45-12108 USFS	45-12795 BLM	47-15062 USFS
45-07505 BLM	45-12109 USFS	45-12813 BLM	47-15063 USFS
			47-15075 USFS

EXHIBIT A

U.S. Claims on Permittees' Allotments

47-15077 USFS	47-15195 USFS	47-16648 USFS	67-07645 BLM
47-15082 USFS	47-15196 USFS	47-16649 USFS	67-07646 BLM
47-15083 USFS	47-15197 USFS	47-16651 USFS	67-07647 BLM
47-15086 USFS	47-15199 USFS	47-16652 USFS	67-07649 BLM
47-15090 USFS	47-15200 USFS	47-16655 USFS	67-07660 BLM
47-15091 USFS	47-15204 USFS	47-16663 USFS	67-07672 BLM
47-15092 USFS	47-15205 USFS	47-16664 USFS	67-12378 BLM
47-15093 USFS	47-16132 BLM	47-16665 USFS	67-12579 BLM
47-15095 USFS	47-16292 BLM	47-16666 USFS	67-12646 BLM
47-15106 USFS	47-16293 BLM	47-16677 USFS	67-12648 BLM
47-15107 USFS	47-16300 BLM	47-16678 USFS	67-12649 BLM
47-15108 USFS	47-16321 BLM	47-16679 USFS	67-12651 BLM
47-15109 USFS	47-16322 BLM	47-16680 USFS	67-12660 BLM
47-15110 USFS	47-16429 USFS	47-16683 USFS	67-12661 BLM
47-15117 USFS	47-16433 USFS	47-16684 USFS	67-12698 BLM
47-15119 USFS	47-16434 USFS	47-16686 USFS	67-12699 BLM
47-15128 USFS	47-16435 USFS	47-16687 USFS	67-12700 BLM
47-15131 USFS	47-16437 USFS	47-16688 USFS	67-12701 BLM
47-15132 USFS	47-16438 USFS	47-16692 USFS	67-12702 BLM
47-15135 USFS	47-16440 USFS	47-16693 USFS	67-12708 BLM
47-15136 USFS	47-16441 USFS	47-16694 USFS	67-12717 BLM
47-15137 USFS	47-16442 USFS	47-16702 USFS	67-12718 BLM
47-15138 USFS	47-16443 USFS	47-16704 USFS	67-12719 BLM
47-15139 USFS	47-16444 USFS	47-16710 USFS	67-12721 BLM
47-15140 USFS	47-16445 USFS	47-16721 USFS	67-12724 BLM
47-15142 USFS	47-16446 USFS	47-16722 USFS	67-12781 BLM
47-15143 USFS	47-16447 USFS	47-16923 BLM	67-12798 BLM
47-15144 USFS	47-16448 USFS		67-12801 BLM
47-15146 USFS	47-16449 USFS	<u>BASIN 67</u>	67-12802 BLM
47-15147 USFS	47-16458 USFS		67-12807 BLM
47-15148 USFS	47-16459 USFS	67-07076 BLM	67-12844 BLM
47-15149 USFS	47-16460 USFS	67-07080 BLM	67-12846 BLM
47-15151 USFS	47-16461 USFS	67-07086 BLM	67-12848 BLM
47-15152 USFS	47-16463 USFS	67-07091 BLM	67-12849 BLM
47-15153 USFS	47-16464 USFS	67-07095 BLM	67-12895 BLM
47-15155 USFS	47-16465 USFS	67-07097 BLM	67-12896 BLM
47-15164 USFS	47-16466 USFS	67-07100 BLM	67-12908 BLM
47-15177 USFS	47-16470 USFS	67-07179 BLM	67-12936 BLM
47-15178 USFS	47-16471 USFS	67-07643 BLM	67-12937 BLM
47-15179 USFS	47-16474 USFS	67-07644 BLM	67-12938 BLM

EXHIBIT A
U.S. Claims on Permittees' Allotments

67-12980 BLM	78-04197 USFS	78-12003 USFS
67-12985 BLM	78-04203 USFS	78-12007 USFS
67-12986 BLM	78-04205 USFS	78-12008 USFS
67-12987 BLM	78-04206 USFS	78-12009 USFS
67-12988 BLM	78-04208 USFS	78-12010 USFS
67-12989 BLM	78-04209 USFS	78-12018 USFS
67-13028 BLM	78-04210 USFS	
67-13030 BLM	78-04211 USFS	
67-13031 BLM	78-04212 USFS	
67-13032 BLM	78-04214 USFS	
67-13033 BLM	78-04216 USFS	
67-13035 BLM	78-04218 USFS	
67-13036 BLM	78-04219 USFS	
67-13037 BLM	78-04224 USFS	
67-13038 BLM	78-04225 USFS	
67-13040 BLM	78-04234 USFS	
67-13041 BLM	78-04238 USFS	
67-13054 BLM	78-04239 USFS	
67-13061 BLM	78-04247 USFS	
67-13062 BLM	78-04249 USFS	
67-13064 BLM	78-10491 USFS	
67-13067 BLM	78-10624 USFS	
67-13068 BLM	78-10626 USFS	
67-13079 BLM	78-10627 USFS	
67-13092 BLM	78-10628 USFS	
67-13187 BLM	78-10629 USFS	
67-13188 BLM	78-10630 USFS	
67-13192 BLM	78-10631 USFS	
67-13193 BLM	78-10632 USFS	
67-13194 BLM	78-10636 USFS	
67-13196 BLM	78-10637 USFS	
67-13336 BLM	78-10638 USFS	
67-14224 BLM	78-10648 USFS	
	78-10650 USFS	
<u>BASIN 69</u>	78-10651 USFS	
	78-10652 USFS	
69-10473 BLM	78-10653 USFS	
	78-10654 USFS	
<u>BASIN 78</u>	78-10655 USFS	
	78-10656 USFS	

EXHIBIT B
Non-Permittee Objections

<u>B32</u>	33-10864	33-10971	37-02961	37-03072	37-07703
32-04005	33-10865	33-10972	37-02964	37-03073	37-07704
32-04015	33-10866	33-10973	37-02967	37-03074	37-07705
32-04028	33-10867	33-10974	37-02969	37-03077	37-07706
32-04029	33-10868	33-10975	37-02970	37-03078	37-07831
32-11250	33-10869	33-10976	37-02971	37-03079	37-07886
	33-10870	33-10977	37-02973	37-03080	37-07887
<u>B33</u>	33-10871	33-10978	37-02982	37-03083	37-07888
33-07085	33-10873	33-10979	37-02984	37-03087	37-07930
33-07149	33-10930		37-02986	37-03092	37-07960
33-07150	33-10931	<u>B37</u>	37-02988	37-03098	37-07962
33-07157	33-10932	37-02818	37-02989	37-03099	37-07964
33-07166	33-10942	37-02831	37-02995	37-03102	37-07965
33-07168	33-10943	37-02832	37-02996	37-03103	37-07967
33-07222	33-10944	37-02845	37-02997	37-03104	37-07973
33-07223	33-10945	37-02868	37-02999	37-03105	37-07976
33-07224	33-10946	37-02871	37-03001	37-03106	37-07977
33-07225	33-10948	37-02874	37-03012	37-03108	37-07978
33-10841	33-10949	37-02888	37-03014	37-03110	37-07979
33-10842	33-10950	37-02892	37-03016	37-03112	37-07980
33-10843	33-10951	37-02893	37-03021	37-03114	37-07981
33-10844	33-10952	37-02894	37-03029	37-03120	37-07983
33-10845	33-10953	37-02900	37-03030	37-03135	37-08016
33-10846	33-10954	37-02901	37-03033	37-03136	37-08025
33-10847	33-10955	37-02903	37-03034	37-03138	37-08040
33-10848	33-10956	37-02907	37-03035	37-03149	37-08041
33-10849	33-10957	37-02909	37-03036	37-03150	37-08043
33-10850	33-10958	37-02910	37-03040	37-03153	37-08044
33-10851	33-10959	37-02911	37-03041	37-03154	37-08045
33-10852	33-10960	37-02912	37-03042	37-04259	37-08047
33-10853	33-10961	37-02936	37-03046	37-04260	37-08048
33-10854	33-10962	37-02940	37-03047	37-04388	37-08050
33-10856	33-10963	37-02943	37-03048	37-07133	37-08051
33-10857	33-10964	37-02944	37-03049	37-07134	37-08053
33-10858	33-10965	37-02946	37-03050	37-07135	37-08155
33-10859	33-10966	37-02947	37-03052	37-07144	37-08156
33-10860	33-10967	37-02952	37-03060	37-07145	37-08161
33-10861	33-10968	37-02957	37-03061	37-07186	37-08167
33-10862	33-10969	37-02958	37-03062	37-07187	37-08185
33-10863	33-10970	37-02960	37-03066	37-07188	37-08186

EXHIBIT B
Non-Permittee Objections

37-08190	37-13456	37-13554	37-13600	37-13654	37-13722
37-08229	37-13462	37-13555	37-13601	37-13656	37-13723
37-08231	37-13463	37-13560	37-13602	37-13658	37-13724
37-08232	37-13470	37-13561	37-13603	37-13659	37-13726
37-08233	37-13471	37-13562	37-13604	37-13661	37-13727
37-08234	37-13475	37-13563	37-13605	37-13662	37-13728
37-08236	37-13480	37-13564	37-13606	37-13663	37-13729
37-08237	37-13481	37-13565	37-13607	37-13666	37-13730
37-08239	37-13484	37-13566	37-13608	37-13667	37-13731
37-08240	37-13485	37-13567	37-13609	37-13668	37-13732
37-08244	37-13486	37-13568	37-13610	37-13669	37-13733
37-08245	37-13487	37-13569	37-13611	37-13670	37-13734
37-08247	37-13488	37-13571	37-13612	37-13671	37-13735
37-08290	37-13489	37-13572	37-13613	37-13672	37-13737
37-08300	37-13490	37-13573	37-13614	37-13673	37-13738
37-08312	37-13491	37-13574	37-13615	37-13674	37-13739
37-08313	37-13492	37-13575	37-13616	37-13677	37-13767
37-08314	37-13493	37-13576	37-13618	37-13678	37-13768
37-08315	37-13494	37-13577	37-13620	37-13679	37-14288
37-08316	37-13495	37-13578	37-13621	37-13680	37-14303
37-08317	37-13496	37-13579	37-13622	37-13681	37-14304
37-08318	37-13498	37-13580	37-13623	37-13683	37-14305
37-08320	37-13499	37-13581	37-13629	37-13684	37-14306
37-08321	37-13500	37-13582	37-13630	37-13685	37-14307
37-08524	37-13501	37-13583	37-13631	37-13687	37-14308
37-12192	37-13503	37-13584	37-13632	37-13688	37-14309
37-13430	37-13513	37-13586	37-13633	37-13689	37-14310
37-13431	37-13514	37-13587	37-13634	37-13690	37-14311
37-13432	37-13520	37-13588	37-13635	37-13691	37-14312
37-13433	37-13521	37-13589	37-13636	37-13692	37-14313
37-13434	37-13524	37-13590	37-13637	37-13694	37-14314
37-13441	37-13532	37-13591	37-13638	37-13695	37-14315
37-13443	37-13543	37-13592	37-13639	37-13703	37-14346
37-13445	37-13544	37-13593	37-13641	37-13704	37-14348
37-13448	37-13546	37-13594	37-13642	37-13706	37-14349
37-13449	37-13547	37-13595	37-13644	37-13707	37-14351
37-13451	37-13549	37-13596	37-13645	37-13708	37-14352
37-13453	37-13550	37-13597	37-13646	37-13713	37-14353
37-13454	37-13551	37-13598	37-13647	37-13714	37-14355
37-13455	37-13552	37-13599	37-13653	37-13721	37-14357

EXHIBIT B
Non-Permittee Objections

37-14358	37-14404	37-14522	37-14618	37-14886	37-15010
37-14359	37-14405	37-14524	37-14620	37-14888	37-15011
37-14360	37-14406	37-14526	37-14623	37-14889	37-15013
37-14362	37-14407	37-14530	37-14624	37-14890	37-15014
37-14363	37-14408	37-14531	37-14625	37-14895	37-15015
37-14364	37-14409	37-14532	37-14626	37-14896	37-15020
37-14365	37-14411	37-14534	37-14631	37-14898	37-15023
37-14366	37-14412	37-14535	37-14656	37-14900	37-15025
37-14367	37-14413	37-14539	37-14657	37-14902	37-15026
37-14368	37-14414	37-14540	37-14658	37-14903	37-15029
37-14369	37-14415	37-14541	37-14661	37-14904	37-15031
37-14370	37-14438	37-14543	37-14662	37-14905	37-15032
37-14371	37-14440	37-14544	37-14663	37-14906	37-15034
37-14372	37-14441	37-14545	37-14664	37-14907	37-15035
37-14373	37-14442	37-14550	37-14666	37-14911	37-15055
37-14374	37-14467	37-14558	37-14677	37-14912	37-15056
37-14376	37-14468	37-14559	37-14681	37-14914	37-15063
37-14377	37-14469	37-14560	37-14735	37-14915	37-15064
37-14379	37-14470	37-14562	37-14736	37-14916	37-15065
37-14380	37-14471	37-14563	37-14737	37-14917	37-15066
37-14381	37-14472	37-14565	37-14738	37-14919	37-15071
37-14382	37-14487	37-14567	37-14739	37-14923	37-15072
37-14383	37-14490	37-14568	37-14742	37-14924	37-15079
37-14384	37-14491	37-14570	37-14744	37-14925	37-15086
37-14385	37-14493	37-14572	37-14745	37-14926	37-15089
37-14386	37-14494	37-14573	37-14746	37-14927	37-15114
37-14387	37-14495	37-14575	37-14747	37-14929	37-15115
37-14388	37-14496	37-14576	37-14748	37-14937	37-15141
37-14389	37-14497	37-14578	37-14749	37-14940	37-15143
37-14390	37-14498	37-14579	37-14750	37-14941	37-15145
37-14391	37-14501	37-14606	37-14751	37-14942	37-15166
37-14392	37-14502	37-14609	37-14752	37-14968	37-15206
37-14393	37-14503	37-14610	37-14766	37-14973	37-15210
37-14395	37-14505	37-14611	37-14779	37-14974	37-15211
37-14396	37-14507	37-14612	37-14781	37-14976	37-15212
37-14399	37-14508	37-14613	37-14864	37-14985	37-15217
37-14400	37-14510	37-14614	37-14874	37-14993	37-15220
37-14401	37-14511	37-14615	37-14876	37-14999	37-15226
37-14402	37-14512	37-14616	37-14880	37-15008	37-15229
37-14403	37-14520	37-14617	37-14885	37-15009	37-15239

EXHIBIT B
Non-Permittee Objections

37-15240	37-15473	37-15638	37-15723	37-15861	37-15953
37-15243	37-15474	37-15640	37-15724	37-15862	37-15954
37-15244	37-15477	37-15641	37-15725	37-15863	37-15955
37-15279	37-15478	37-15643	37-15727	37-15868	37-15956
37-15281	37-15479	37-15644	37-15728	37-15869	37-15960
37-15282	37-15494	37-15645	37-15730	37-15870	37-15961
37-15283	37-15498	37-15646	37-15731	37-15872	37-15964
37-15284	37-15505	37-15647	37-15734	37-15873	37-15965
37-15303	37-15523	37-15649	37-15735	37-15876	37-15967
37-15304	37-15524	37-15652	37-15736	37-15877	37-15968
37-15305	37-15588	37-15654	37-15737	37-15878	37-15969
37-15306	37-15589	37-15655	37-15738	37-15879	37-15970
37-15307	37-15590	37-15661	37-15739	37-15880	37-15975
37-15326	37-15591	37-15662	37-15740	37-15881	37-15983
37-15327	37-15592	37-15663	37-15745	37-15883	37-15984
37-15328	37-15593	37-15673	37-15748	37-15884	37-15987
37-15329	37-15594	37-15674	37-15750	37-15886	37-15994
37-15330	37-15599	37-15675	37-15752	37-15887	37-15996
37-15331	37-15600	37-15677	37-15753	37-15888	37-16000
37-15333	37-15602	37-15679	37-15761	37-15889	37-16002
37-15337	37-15605	37-15680	37-15762	37-15891	37-16004
37-15341	37-15606	37-15681	37-15763	37-15892	37-16006
37-15363	37-15607	37-15684	37-15764	37-15893	37-16009
37-15366	37-15608	37-15685	37-15765	37-15895	37-16010
37-15367	37-15610	37-15687	37-15769	37-15896	37-16012
37-15368	37-15612	37-15688	37-15771	37-15897	37-16034
37-15386	37-15613	37-15690	37-15772	37-15898	37-16035
37-15430	37-15614	37-15691	37-15773	37-15899	37-16036
37-15433	37-15616	37-15692	37-15777	37-15905	37-16037
37-15436	37-15619	37-15694	37-15778	37-15910	37-16038
37-15438	37-15622	37-15696	37-15780	37-15911	37-16039
37-15442	37-15623	37-15701	37-15781	37-15914	37-16040
37-15443	37-15624	37-15711	37-15782	37-15916	37-16041
37-15460	37-15625	37-15712	37-15783	37-15918	37-16042
37-15461	37-15627	37-15713	37-15792	37-15928	37-16043
37-15463	37-15630	37-15714	37-15795	37-15934	37-16044
37-15465	37-15631	37-15716	37-15803	37-15939	37-16045
37-15466	37-15633	37-15718	37-15858	37-15946	37-16046
37-15467	37-15635	37-15721	37-15859	37-15950	37-16047
37-15470	37-15636	37-15722	37-15860	37-15952	37-16048

EXHIBIT B
Non-Permittee Objections

37-16049	37-16099	37-16462	37-16629	37-16833	37-16961
37-16050	37-16106	37-16478	37-16631	37-16859	37-16975
37-16051	37-16110	37-16479	37-16639	37-16863	37-16982
37-16052	37-16113	37-16482	37-16641	37-16864	37-16992
37-16053	37-16118	37-16485	37-16651	37-16873	37-16996
37-16054	37-16124	37-16487	37-16657	37-16874	37-16998
37-16055	37-16128	37-16488	37-16659	37-16875	37-17000
37-16056	37-16130	37-16489	37-16669	37-16879	37-17038
37-16057	37-16131	37-16490	37-16671	37-16884	37-17039
37-16058	37-16132	37-16494	37-16673	37-16887	37-17048
37-16059	37-16136	37-16495	37-16675	37-16890	37-17049
37-16060	37-16137	37-16498	37-16677	37-16892	37-17050
37-16061	37-16140	37-16506	37-16679	37-16893	37-17051
37-16062	37-16142	37-16512	37-16681	37-16898	37-17073
37-16063	37-16143	37-16520	37-16685	37-16899	37-17074
37-16064	37-16144	37-16521	37-16697	37-16900	37-17075
37-16065	37-16159	37-16522	37-16701	37-16905	37-17077
37-16066	37-16162	37-16526	37-16703	37-16906	37-17089
37-16067	37-16167	37-16540	37-16705	37-16907	37-17095
37-16068	37-16169	37-16541	37-16735	37-16908	37-17096
37-16070	37-16174	37-16542	37-16739	37-16909	37-17098
37-16071	37-16175	37-16543	37-16741	37-16911	37-17104
37-16072	37-16176	37-16544	37-16753	37-16914	37-17106
37-16073	37-16193	37-16545	37-16755	37-16915	37-17110
37-16074	37-16228	37-16546	37-16757	37-16916	37-17115
37-16075	37-16235	37-16559	37-16759	37-16921	37-17117
37-16076	37-16240	37-16565	37-16763	37-16922	37-17120
37-16077	37-16241	37-16567	37-16765	37-16923	37-17121
37-16078	37-16242	37-16569	37-16769	37-16924	37-17128
37-16080	37-16243	37-16571	37-16781	37-16925	37-17129
37-16081	37-16246	37-16577	37-16791	37-16945	37-17132
37-16083	37-16250	37-16579	37-16799	37-16946	37-17133
37-16084	37-16297	37-16593	37-16805	37-16947	37-17136
37-16088	37-16340	37-16599	37-16807	37-16949	37-17137
37-16089	37-16388	37-16603	37-16809	37-16950	37-17138
37-16090	37-16389	37-16605	37-16811	37-16951	37-17139
37-16091	37-16392	37-16607	37-16813	37-16952	37-17140
37-16092	37-16427	37-16611	37-16825	37-16953	37-17142
37-16093	37-16451	37-16615	37-16827	37-16958	37-17143
37-16097	37-16452	37-16627	37-16829	37-16959	37-17145

EXHIBIT B
Non-Permittee Objections

37-17146	37-17247	37-17406	37-17453	37-17539	37-17630
37-17147	37-17258	37-17407	37-17454	37-17542	37-17632
37-17149	37-17287	37-17408	37-17455	37-17543	37-17637
37-17150	37-17289	37-17410	37-17456	37-17544	37-17646
37-17151	37-17291	37-17411	37-17457	37-17545	37-17648
37-17152	37-17292	37-17412	37-17458	37-17549	37-17649
37-17153	37-17293	37-17413	37-17459	37-17551	37-17661
37-17154	37-17295	37-17414	37-17460	37-17566	37-17663
37-17155	37-17299	37-17415	37-17461	37-17568	37-17665
37-17157	37-17301	37-17416	37-17463	37-17570	37-17666
37-17161	37-17302	37-17417	37-17464	37-17571	37-17668
37-17162	37-17313	37-17418	37-17465	37-17573	37-17669
37-17163	37-17314	37-17419	37-17466	37-17574	37-17670
37-17164	37-17315	37-17420	37-17467	37-17575	37-17675
37-17165	37-17316	37-17421	37-17469	37-17576	37-17707
37-17166	37-17322	37-17422	37-17473	37-17577	37-17708
37-17167	37-17325	37-17423	37-17476	37-17578	37-17710
37-17168	37-17333	37-17424	37-17477	37-17579	37-17711
37-17173	37-17335	37-17427	37-17478	37-17580	37-17726
37-17174	37-17336	37-17428	37-17481	37-17582	37-17748
37-17178	37-17338	37-17429	37-17485	37-17583	37-17752
37-17179	37-17339	37-17430	37-17486	37-17584	37-17754
37-17180	37-17341	37-17431	37-17488	37-17587	37-17755
37-17181	37-17343	37-17432	37-17494	37-17588	37-17756
37-17183	37-17346	37-17433	37-17501	37-17591	37-17757
37-17184	37-17349	37-17434	37-17506	37-17594	37-17765
37-17192	37-17350	37-17436	37-17507	37-17597	37-17766
37-17194	37-17351	37-17438	37-17510	37-17598	37-17767
37-17196	37-17352	37-17439	37-17511	37-17601	37-17768
37-17197	37-17354	37-17440	37-17514	37-17602	37-17770
37-17198	37-17355	37-17441	37-17516	37-17603	37-17771
37-17208	37-17356	37-17442	37-17518	37-17604	37-17774
37-17209	37-17357	37-17443	37-17521	37-17609	37-17776
37-17210	37-17358	37-17444	37-17522	37-17610	37-17778
37-17217	37-17359	37-17445	37-17524	37-17615	37-17779
37-17218	37-17373	37-17446	37-17525	37-17624	37-17780
37-17220	37-17391	37-17447	37-17530	37-17626	37-17795
37-17221	37-17397	37-17448	37-17533	37-17627	37-17796
37-17244	37-17402	37-17450	37-17534	37-17628	37-17805
37-17245	37-17405	37-17451	37-17538	37-17629	37-17807

EXHIBIT B
Non-Permittee Objections

37-17808	37-17866	37-17942	37-18447	37-19172	37-19302
37-17809	37-17867	37-17943	37-18449	37-19175	37-19303
37-17810	37-17868	37-17944	37-18458	37-19176	37-19304
37-17811	37-17870	37-17945	37-18459	37-19177	37-19307
37-17813	37-17873	37-17946	37-18466	37-19178	37-19308
37-17818	37-17874	37-17947	37-18476	37-19182	37-19309
37-17819	37-17875	37-17948	37-18477	37-19183	37-19310
37-17824	37-17876	37-17949	37-18479	37-19184	37-19311
37-17825	37-17877	37-17950	37-18481	37-19193	37-19312
37-17826	37-17878	37-17954	37-18496	37-19194	37-19313
37-17827	37-17881	37-17955	37-18498	37-19242	37-19314
37-17829	37-17882	37-17956	37-18501	37-19246	37-19318
37-17836	37-17884	37-17958	37-18502	37-19252	37-19319
37-17837	37-17885	37-17960	37-18505	37-19256	37-19320
37-17838	37-17891	37-17961	37-18592	37-19259	37-19321
37-17839	37-17893	37-17962	37-18593	37-19275	37-19322
37-17840	37-17895	37-17963	37-18605	37-19276	37-19323
37-17841	37-17897	37-17965	37-18608	37-19277	37-19324
37-17843	37-17904	37-17967	37-18619	37-19278	37-19355
37-17844	37-17908	37-17968	37-18621	37-19279	37-19359
37-17845	37-17909	37-17969	37-18622	37-19280	37-19360
37-17846	37-17911	37-17970	37-18637	37-19281	37-19364
37-17847	37-17912	37-17973	37-18639	37-19282	37-19365
37-17848	37-17921	37-17980	37-18640	37-19283	37-19366
37-17849	37-17922	37-17990	37-18642	37-19284	37-19367
37-17850	37-17923	37-17993	37-18643	37-19285	37-19368
37-17851	37-17924	37-17999	37-18644	37-19286	37-19380
37-17852	37-17925	37-18096	37-18646	37-19287	37-19382
37-17853	37-17926	37-18141	37-18647	37-19288	37-19386
37-17854	37-17927	37-18142	37-18648	37-19290	37-19392
37-17855	37-17928	37-18143	37-18650	37-19291	37-19394
37-17856	37-17929	37-18144	37-18652	37-19292	37-19395
37-17857	37-17931	37-18155	37-18653	37-19293	37-19396
37-17858	37-17932	37-18284	37-18654	37-19294	37-19397
37-17860	37-17933	37-18387	37-18655	37-19296	37-19400
37-17861	37-17934	37-18388	37-19114	37-19297	37-19406
37-17862	37-17937	37-18420	37-19161	37-19298	37-19407
37-17863	37-17938	37-18432	37-19162	37-19299	37-19412
37-17864	37-17939	37-18435	37-19170	37-19300	37-19413
37-17865	37-17941	37-18446	37-19171	37-19301	37-19414

EXHIBIT B
Non-Permittee Objections

37-19415	37-19580	37-19871	37-19925	37-19971	37-20011
37-19418	37-19582	37-19872	37-19929	37-19972	37-20012
37-19419	37-19584	37-19874	37-19930	37-19973	37-20013
37-19420	37-19595	37-19875	37-19931	37-19974	37-20014
37-19422	37-19602	37-19877	37-19932	37-19975	37-20015
37-19423	37-19605	37-19889	37-19936	37-19976	37-20016
37-19424	37-19607	37-19890	37-19937	37-19977	37-20017
37-19425	37-19612	37-19891	37-19938	37-19978	37-20018
37-19426	37-19617	37-19892	37-19939	37-19979	37-20019
37-19427	37-19621	37-19893	37-19940	37-19980	37-20020
37-19430	37-19643	37-19894	37-19941	37-19981	37-20021
37-19431	37-19677	37-19895	37-19942	37-19982	37-20022
37-19432	37-19678	37-19896	37-19943	37-19983	37-20023
37-19434	37-19679	37-19897	37-19944	37-19984	37-20024
37-19437	37-19680	37-19898	37-19945	37-19985	37-20025
37-19463	37-19681	37-19899	37-19946	37-19986	37-20026
37-19464	37-19683	37-19900	37-19947	37-19987	37-20027
37-19465	37-19685	37-19901	37-19948	37-19988	37-20028
37-19466	37-19687	37-19902	37-19949	37-19989	37-20030
37-19471	37-19689	37-19903	37-19950	37-19990	37-20031
37-19472	37-19690	37-19904	37-19951	37-19991	37-20032
37-19473	37-19849	37-19906	37-19952	37-19992	37-20033
37-19474	37-19850	37-19907	37-19953	37-19993	37-20034
37-19475	37-19852	37-19908	37-19954	37-19994	37-20042
37-19477	37-19853	37-19909	37-19955	37-19995	37-20044
37-19502	37-19854	37-19910	37-19956	37-19996	37-20045
37-19503	37-19857	37-19911	37-19957	37-19997	37-20048
37-19504	37-19858	37-19912	37-19958	37-19998	37-20049
37-19526	37-19859	37-19913	37-19959	37-19999	37-20052
37-19527	37-19860	37-19914	37-19960	37-20000	37-20061
37-19528	37-19861	37-19915	37-19961	37-20001	37-20063
37-19550	37-19862	37-19916	37-19962	37-20002	37-20066
37-19551	37-19863	37-19917	37-19963	37-20003	37-20072
37-19552	37-19864	37-19918	37-19964	37-20004	37-20073
37-19553	37-19865	37-19919	37-19965	37-20005	37-20074
37-19573	37-19866	37-19920	37-19966	37-20006	37-20076
37-19574	37-19867	37-19921	37-19967	37-20007	37-20078
37-19575	37-19868	37-19922	37-19968	37-20008	37-20079
37-19576	37-19869	37-19923	37-19969	37-20009	37-20081
37-19578	37-19870	37-19924	37-19970	37-20010	37-20085

EXHIBIT B
Non-Permittee Objections

37-20086	37-20176	67-02418	67-04403	67-07092	67-11782
37-20087	37-20177	67-02419	67-04404	67-07093	67-11783
37-20088	37-20178	67-02420	67-04406	67-07094	67-11785
37-20090	37-20179	67-02423	67-04407	67-07096	67-11786
37-20098	37-20182	67-02424	67-04408	67-07098	67-11787
37-20100	37-20183	67-02426	67-04427	67-07099	67-11788
37-20101	37-20186	67-04350	67-04428	67-07121	67-11790
37-20104	37-20193	67-04351	67-04429	67-07176	67-11791
37-20105	37-20195	67-04356	67-04431	67-07218	67-11792
37-20110	37-20196	67-04357	67-04432	67-07246	67-11793
37-20111	37-20197	67-04358	67-04439	67-07262	67-11794
37-20112	37-20198	67-04359	67-04440	67-07267	67-11795
37-20113	37-20199	67-04363	67-04441	67-07268	67-11797
37-20115	37-20203	67-04365	67-04442	67-07269	67-11799
37-20116	37-20204	67-04366	67-04443A	67-07270	67-11800
37-20119	37-20205	67-04371	67-04446	67-07552	67-11801
37-20120	37-20206	67-04372	67-04447	67-07613	67-11802
37-20122	37-20218	67-04373	67-04476	67-07616	67-11803
37-20123	37-20227	67-04374	67-04477	67-07640	67-11804
37-20131	37-20228	67-04375	67-04481	67-07641	67-11805
37-20133	37-20247	67-04377	67-04482	67-07642	67-11806
37-20134	37-20249	67-04378	67-04502	67-07652	67-11807
37-20138	37-20250	67-04379	67-04505	67-07657	67-11808
37-20141	37-20251	67-04380	67-04506	67-07658	67-11811
37-20142	37-20253	67-04381	67-04507	67-07659	67-11812
37-20143	37-20257	67-04383	67-04521	67-07661	67-11815
37-20144	37-20258	67-04385	67-04526	67-07662	67-11816
37-20145	37-20262	67-04386	67-04528	67-07663	67-11817
37-20147	37-20263	67-04388	67-04582	67-07664	67-11818
37-20149		67-04389	67-04583	67-07665	67-11819
37-20150	<u>B41</u>	67-04390	67-07077	67-07670	67-11820
37-20152	41-10228	67-04391	67-07078	67-07675	67-11821
37-20156		67-04393	67-07079	67-07682	67-11822
37-20157	<u>B67</u>	67-04394	67-07081	67-07683	67-11823
37-20158	67-02387	67-04395	67-07082	67-07719	67-11824
37-20163	67-02388	67-04396	67-07083	67-07743	67-11825
37-20164	67-02414	67-04398	67-07084	67-07745	67-11826
37-20165	67-02415	67-04399	67-07085	67-07832	67-11827
37-20173	67-02416	67-04400	67-07087	67-11780	67-11829
37-20174	67-02417	67-04401	67-07090	67-11781	67-11830

EXHIBIT B
Non-Permittee Objections

67-11831	67-11883	67-11937	67-11980	67-12024	67-12073
67-11832	67-11884	67-11938	67-11982	67-12025	67-12074
67-11833	67-11885	67-11939	67-11983	67-12026	67-12075
67-11834	67-11886	67-11940	67-11984	67-12027	67-12076
67-11835	67-11887	67-11941	67-11985	67-12028	67-12077
67-11836	67-11888	67-11942	67-11986	67-12029	67-12078
67-11837	67-11890	67-11943	67-11987	67-12034	67-12079
67-11838	67-11891	67-11944	67-11988	67-12035	67-12080
67-11839	67-11892	67-11945	67-11989	67-12037	67-12081
67-11841	67-11893	67-11946	67-11990	67-12038	67-12082
67-11842	67-11894	67-11947	67-11991	67-12039	67-12083
67-11843	67-11895	67-11948	67-11992	67-12040	67-12084
67-11844	67-11897	67-11950	67-11993	67-12041	67-12086
67-11845	67-11898	67-11951	67-11994	67-12042	67-12088
67-11846	67-11900	67-11952	67-11995	67-12043	67-12090
67-11847	67-11903	67-11953	67-11996	67-12044	67-12091
67-11848	67-11905	67-11954	67-11997	67-12045	67-12092
67-11849	67-11906	67-11955	67-11998	67-12046	67-12093
67-11852	67-11907	67-11956	67-12001	67-12047	67-12094
67-11853	67-11908	67-11957	67-12003	67-12048	67-12095
67-11854	67-11909	67-11958	67-12004	67-12050	67-12096
67-11855	67-11910	67-11959	67-12005	67-12051	67-12097
67-11856	67-11911	67-11960	67-12006	67-12054	67-12098
67-11857	67-11912	67-11961	67-12007	67-12055	67-12099
67-11858	67-11913	67-11962	67-12008	67-12056	67-12100
67-11860	67-11914	67-11963	67-12009	67-12058	67-12101
67-11861	67-11915	67-11965	67-12010	67-12059	67-12102
67-11862	67-11916	67-11966	67-12011	67-12060	67-12103
67-11863	67-11917	67-11967	67-12012	67-12061	67-12104
67-11864	67-11924	67-11968	67-12013	67-12062	67-12105
67-11865	67-11926	67-11969	67-12014	67-12063	67-12106
67-11866	67-11927	67-11970	67-12015	67-12064	67-12107
67-11867	67-11928	67-11971	67-12016	67-12065	67-12112
67-11868	67-11929	67-11972	67-12017	67-12066	67-12113
67-11869	67-11930	67-11973	67-12018	67-12067	67-12114
67-11870	67-11931	67-11974	67-12019	67-12068	67-12115
67-11871	67-11933	67-11975	67-12020	67-12069	67-12117
67-11872	67-11934	67-11976	67-12021	67-12070	67-12119
67-11879	67-11935	67-11978	67-12022	67-12071	67-12121
67-11881	67-11936	67-11979	67-12023	67-12072	67-12122

EXHIBIT B
Non-Permittee Objections

67-12123	67-12396	67-12462	67-12518	67-12580	67-12640
67-12124	67-12397	67-12463	67-12519	67-12581	67-12641
67-12125	67-12398	67-12464	67-12523	67-12582	67-12642
67-12126	67-12399	67-12465	67-12527	67-12583	67-12647
67-12127	67-12400	67-12466	67-12529	67-12584	67-12653
67-12128	67-12401	67-12469	67-12531	67-12585	67-12654
67-12130	67-12403	67-12470	67-12532	67-12586	67-12655
67-12131	67-12404	67-12474	67-12533	67-12587	67-12656
67-12132	67-12405	67-12475	67-12534	67-12588	67-12657
67-12343	67-12406	67-12476	67-12535	67-12589	67-12658
67-12344	67-12407	67-12478	67-12537	67-12590	67-12659
67-12346	67-12408	67-12479	67-12540	67-12591	67-12662
67-12348	67-12409	67-12480	67-12541	67-12592	67-12664
67-12352	67-12411	67-12481	67-12544	67-12593	67-12666
67-12356	67-12412	67-12483	67-12545	67-12595	67-12668
67-12359	67-12413	67-12484	67-12546	67-12596	67-12669
67-12361	67-12414	67-12485	67-12547	67-12599	67-12671
67-12362	67-12415	67-12486	67-12548	67-12601	67-12673
67-12364	67-12416	67-12487	67-12552	67-12602	67-12675
67-12365	67-12418	67-12492	67-12553	67-12605	67-12677
67-12367	67-12419	67-12495	67-12554	67-12608	67-12678
67-12368	67-12420	67-12496	67-12555	67-12609	67-12683
67-12369	67-12421	67-12497	67-12556	67-12610	67-12685
67-12370	67-12427	67-12498	67-12557	67-12611	67-12686
67-12371	67-12429	67-12499	67-12558	67-12613	67-12687
67-12372	67-12431	67-12500	67-12559	67-12614	67-12688
67-12373	67-12433	67-12501	67-12560	67-12616	67-12689
67-12374	67-12435	67-12502	67-12561	67-12618	67-12691
67-12375	67-12437	67-12503	67-12562	67-12620	67-12693
67-12376	67-12443	67-12504	67-12563	67-12623	67-12695
67-12377	67-12445	67-12505	67-12564	67-12624	67-12697
67-12379	67-12447	67-12506	67-12565	67-12631	67-12703
67-12380	67-12450	67-12507	67-12566	67-12632	67-12704
67-12381	67-12455	67-12508	67-12568	67-12633	67-12705
67-12382	67-12456	67-12509	67-12572	67-12634	67-12706
67-12386	67-12457	67-12510	67-12574	67-12635	67-12707
67-12388	67-12458	67-12511	67-12575	67-12636	67-12709
67-12392	67-12459	67-12512	67-12576	67-12637	67-12710
67-12393	67-12460	67-12516	67-12577	67-12638	67-12713
67-12395	67-12461	67-12517	67-12578	67-12639	67-12714

EXHIBIT B
Non-Permittee Objections

67-12715	67-12785	67-12905	67-13014	67-13115	67-13264
67-12716	67-12786	67-12913	67-13015	67-13119	67-13269
67-12720	67-12790	67-12917	67-13016	67-13120	67-13270
67-12727	67-12792	67-12920	67-13017	67-13121	67-13273
67-12729	67-12794	67-12924	67-13019	67-13123	67-13275
67-12734	67-12796	67-12928	67-13020	67-13124	67-13277
67-12736	67-12799	67-12929	67-13024	67-13125	67-13278
67-12738	67-12809	67-12930	67-13026	67-13126	67-13281
67-12740	67-12810	67-12939	67-13027	67-13128	67-13282
67-12741	67-12811	67-12940	67-13029	67-13136	67-13284
67-12742	67-12815	67-12942	67-13042	67-13137	67-13285
67-12743	67-12817	67-12949	67-13044	67-13140	67-13286
67-12744	67-12819	67-12952	67-13045	67-13141	67-13287
67-12745	67-12826	67-12954	67-13046	67-13142	67-13288
67-12746	67-12828	67-12955	67-13047	67-13147	67-13289
67-12747	67-12830	67-12956	67-13050	67-13148	67-13292
67-12748	67-12840	67-12957	67-13055	67-13150	67-13293
67-12749	67-12841	67-12958	67-13056	67-13153	67-13295
67-12750	67-12850	67-12959	67-13058	67-13154	67-13296
67-12751	67-12851	67-12960	67-13069	67-13159	67-13298
67-12752	67-12852	67-12968	67-13070	67-13168	67-13299
67-12753	67-12853	67-12969	67-13071	67-13174	67-13300
67-12754	67-12855	67-12973	67-13072	67-13180	67-13301
67-12759	67-12864	67-12974	67-13077	67-13181	67-13302
67-12761	67-12865	67-12977	67-13078	67-13183	67-13303
67-12763	67-12869	67-12978	67-13080	67-13184	67-13304
67-12765	67-12870	67-12979	67-13082	67-13185	67-13306
67-12766	67-12872	67-12981	67-13084	67-13226	67-13307
67-12768	67-12873	67-12982	67-13085	67-13231	67-13310
67-12769	67-12874	67-12984	67-13086	67-13232	67-13311
67-12771	67-12876	67-12990	67-13089	67-13233	67-13316
67-12772	67-12885	67-12991	67-13094	67-13234	67-13323
67-12775	67-12886	67-12998	67-13095	67-13235	67-13324
67-12776	67-12888	67-12999	67-13096	67-13239	67-13327
67-12777	67-12889	67-13001	67-13097	67-13245	67-13328
67-12779	67-12890	67-13006	67-13098	67-13247	67-13330
67-12780	67-12892	67-13008	67-13100	67-13257	67-13334
67-12782	67-12893	67-13009	67-13101	67-13258	67-13339
67-12783	67-12899	67-13010	67-13107	67-13261	67-13505
67-12784	67-12900	67-13013	67-13114	67-13263	67-13506

EXHIBIT B
Non-Permittee Objections

67-13508	67-14200	69-04041	69-04093	69-10128	69-10175
67-14130	67-14201	69-04042	69-04094	69-10131	69-10176
67-14138	67-14202	69-04043	69-04097	69-10132	69-10177
67-14139	67-14203	69-04044	69-04098	69-10133	69-10178
67-14141	67-14204	69-04045	69-04101	69-10134	69-10179
67-14163	67-14205	69-04046	69-07014	69-10135	69-10180
67-14164	67-14206	69-04047	69-07015	69-10136	69-10181
67-14165	67-14207	69-04048	69-07051	69-10137	69-10182
67-14166	67-14208	69-04049	69-07061	69-10138	69-10183
67-14167	67-14209	69-04050	69-07067	69-10139	69-10184
67-14168	67-14210	69-04052	69-07068	69-10140	69-10185
67-14169	67-14211	69-04053	69-07069	69-10141	69-10186
67-14170	67-14212	69-04054	69-07076	69-10143	69-10187
67-14171	67-14213	69-04055	69-10099	69-10144	69-10188
67-14172	67-14214	69-04056	69-10100	69-10145	69-10189
67-14173	67-14215	69-04057	69-10101	69-10146	69-10190
67-14174	67-14216	69-04059	69-10102	69-10147	69-10191
67-14175	67-14217	69-04060	69-10104	69-10148	69-10192
67-14176	67-14218	69-04061	69-10105	69-10149	69-10193
67-14177	67-14219	69-04062	69-10106	69-10150	69-10194
67-14178	67-14220	69-04063	69-10107	69-10151	69-10195
67-14179	67-14223	69-04064	69-10108	69-10152	69-10196
67-14180	67-14225	69-04065	69-10109	69-10153	69-10197
67-14181	67-14231	69-04067	69-10110	69-10154	69-10198
67-14182	67-14232	69-04068	69-10111	69-10156	69-10199
67-14183		69-04069	69-10112	69-10157	69-10200
67-14184		69-04071	69-10113	69-10159	69-10201
67-14185	B69	69-04073	69-10114	69-10160	69-10202
67-14186	69-04028	69-04074	69-10115	69-10162	69-10203
67-14187	69-04029	69-04075	69-10116	69-10163	69-10204
67-14188	69-04030	69-04076	69-10117	69-10164	69-10205
67-14189	69-04031	69-04077	69-10118	69-10165	69-10207
67-14190	69-04032	69-04078	69-10120	69-10166	69-10208
67-14191	69-04034	69-04082	69-10121	69-10167	69-10209
67-14192	69-04035	69-04083	69-10122	69-10168	69-10210
67-14193	69-04036	69-04084	69-10123	69-10169	69-10211
67-14194	69-04037	69-04087	69-10124	69-10170	69-10212
67-14195	69-04038	69-04088	69-10125	69-10171	69-10213
67-14196	69-04039	69-04089	69-10126	69-10172	69-10214
67-14197	69-04040	69-04090	69-10127	69-10173	69-10215

EXHIBIT B
Non-Permittee Objections

69-10217	69-10259	69-10454	69-10511	69-10617	69-10721
69-10218	69-10261	69-10455	69-10512	69-10618	69-10722
69-10219	69-10262	69-10456	69-10513	69-10620	69-10724
69-10220	69-10263	69-10457	69-10514	69-10629	69-10725
69-10221	69-10264	69-10458	69-10515	69-10630	69-10726
69-10223	69-10266	69-10459	69-10516	69-10631	69-10727
69-10224	69-10267	69-10460	69-10517	69-10633	69-10728
69-10225	69-10268	69-10461	69-10518	69-10634	69-10730
69-10226	69-10269	69-10462	69-10519	69-10636	69-10733
69-10228	69-10270	69-10463	69-10520	69-10637	69-10736
69-10229	69-10271	69-10464	69-10521	69-10638	69-10737
69-10230	69-10272	69-10465	69-10522	69-10639	69-10738
69-10231	69-10273	69-10466	69-10523	69-10647	69-10742
69-10232	69-10274	69-10474	69-10524	69-10648	69-10743
69-10233	69-10275	69-10476	69-10525	69-10649	69-10746
69-10234	69-10276	69-10477	69-10526	69-10650	69-10747
69-10235	69-10412	69-10484	69-10527	69-10657	69-10749
69-10236	69-10414	69-10485	69-10528	69-10658	69-10750
69-10237	69-10429	69-10486	69-10529	69-10659	69-10751
69-10238	69-10430	69-10487	69-10531	69-10660	69-11404
69-10239	69-10431	69-10488	69-10533	69-10663	69-11411
69-10240	69-10432	69-10489	69-10537	69-10678	69-11413
69-10241	69-10433	69-10490	69-10539	69-10684	69-11414
69-10242	69-10434	69-10491	69-10541	69-10686	69-11415
69-10243	69-10435	69-10492	69-10546	69-10687	69-11418
69-10244	69-10436	69-10493	69-10547	69-10688	69-11420
69-10245	69-10437	69-10494	69-10548	69-10689	69-11421
69-10246	69-10438	69-10495	69-10549	69-10691	69-11422
69-10247	69-10439	69-10496	69-10554	69-10692	69-11424
69-10248	69-10441	69-10497	69-10556	69-10694	69-11425
69-10249	69-10443	69-10498	69-10566	69-10695	69-11426
69-10250	69-10444	69-10501	69-10570	69-10696	69-11427
69-10251	69-10445	69-10502	69-10572	69-10697	69-11428
69-10252	69-10446	69-10503	69-10574	69-10698	69-11429
69-10253	69-10447	69-10504	69-10576	69-10701	69-11430
69-10254	69-10448	69-10505	69-10578	69-10713	69-11433
69-10255	69-10450	69-10506	69-10581	69-10715	69-11434
69-10256	69-10451	69-10508	69-10608	69-10716	69-11435
69-10257	69-10452	69-10509	69-10610	69-10717	69-11436
69-10258	69-10453	69-10510	69-10616	69-10719	69-11437

EXHIBIT B
Non-Permittee Objections

69-11438	77-07290	77-10178	77-10302	77-10626	77-10934
69-11439	77-10138	77-10179	77-10304	77-10627	77-10997
69-11440	77-10139	77-10180	77-10305	77-10628	77-11001
69-11441	77-10140	77-10181	77-10309	77-10629	77-11002
69-11442	77-10141	77-10182	77-10313	77-10633	77-11003
69-11443	77-10142	77-10185	77-10314	77-10635	77-11004
69-11444	77-10143	77-10186	77-10315	77-10636	77-11005
69-11445	77-10145	77-10187	77-10317	77-10637	77-11006
69-11446	77-10146	77-10189	77-10319	77-10638	77-11007
69-11447	77-10147	77-10190	77-10320	77-10639	77-11008
69-11448	77-10148	77-10191	77-10321	77-10640	77-11009
69-11449	77-10149	77-10193	77-10322	77-10641	77-11010
69-11450	77-10150	77-10195	77-10323	77-10868	77-11012
69-11451	77-10151	77-10196	77-10324	77-10869	77-11013
69-11452	77-10152	77-10197	77-10325	77-10870	77-11014
69-11453	77-10153	77-10198	77-10326	77-10888	77-11015
69-11454	77-10154	77-10199	77-10327	77-10890	77-11016
69-11455	77-10155	77-10200	77-10328	77-10891	77-11017
69-11456	77-10156	77-10201	77-10329	77-10892	77-11018
69-11457	77-10157	77-10202	77-10330	77-10893	77-11020
69-11458	77-10158	77-10203	77-10331	77-10894	77-11021
69-11459	77-10159	77-10204	77-10333	77-10895	77-11022
69-11460	77-10160	77-10205	77-10334	77-10898	77-11023
69-11461	77-10161	77-10206	77-10338	77-10901	77-11027
69-11462	77-10162	77-10207	77-10340	77-10907	77-11028
69-11463	77-10163	77-10208	77-10341	77-10915	77-11029
69-11464	77-10164	77-10262	77-10342	77-10916	77-11030
	77-10165	77-10279	77-10350	77-10917	77-11031
B77	77-10166	77-10283	77-10351	77-10919	77-11032
77-04094	77-10167	77-10285	77-10352	77-10920	77-11033
77-04096	77-10168	77-10286	77-10353	77-10921	77-11034
77-04098	77-10169	77-10287	77-10356	77-10922	77-11038
77-04099	77-10170	77-10289	77-10357	77-10925	77-11041
77-04106	77-10171	77-10290	77-10616	77-10926	77-11046
77-04109	77-10172	77-10291	77-10617	77-10928	77-11047
77-04112	77-10173	77-10292	77-10618	77-10929	77-11048
77-04113	77-10174	77-10293	77-10619	77-10930	77-11049
77-04192	77-10175	77-10295	77-10620	77-10931	77-11050
77-07139	77-10176	77-10296	77-10621	77-10932	77-11059
77-07196	77-10177	77-10297	77-10625	77-10933	77-11061

EXHIBIT B
Non-Permittee Objections

77-11062	77-11130	77-11212	77-11292	77-11372	77-11454
77-11063	77-11132	77-11214	77-11294	77-11374	77-11456
77-11065	77-11134	77-11216	77-11296	77-11376	77-11457
77-11069	77-11136	77-11218	77-11298	77-11378	77-11458
77-11070	77-11138	77-11220	77-11300	77-11380	77-11459
77-11071	77-11140	77-11222	77-11302	77-11382	77-11462
77-11072	77-11142	77-11224	77-11304	77-11384	77-11464
77-11073	77-11144	77-11226	77-11306	77-11386	77-11465
77-11075	77-11146	77-11228	77-11308	77-11388	77-11466
77-11076	77-11148	77-11230	77-11310	77-11390	77-11472
77-11077	77-11150	77-11232	77-11312	77-11392	77-11474
77-11078	77-11152	77-11234	77-11314	77-11394	77-11476
77-11079	77-11154	77-11236	77-11316	77-11396	77-11478
77-11080	77-11156	77-11238	77-11318	77-11398	77-11480
77-11081	77-11158	77-11240	77-11320	77-11400	77-11482
77-11082	77-11160	77-11242	77-11322	77-11402	77-11484
77-11083	77-11162	77-11244	77-11324	77-11404	77-11486
77-11084	77-11164	77-11246	77-11326	77-11406	77-11488
77-11086	77-11166	77-11248	77-11328	77-11408	77-11490
77-11088	77-11168	77-11250	77-11330	77-11410	77-11492
77-11090	77-11170	77-11252	77-11332	77-11412	77-11494
77-11092	77-11172	77-11254	77-11334	77-11414	77-11496
77-11094	77-11174	77-11256	77-11336	77-11416	77-11498
77-11096	77-11176	77-11258	77-11338	77-11418	77-11500
77-11098	77-11178	77-11260	77-11340	77-11420	77-11501
77-11100	77-11180	77-11262	77-11342	77-11422	77-11502
77-11102	77-11182	77-11264	77-11344	77-11424	77-11503
77-11104	77-11186	77-11266	77-11346	77-11426	77-11504
77-11106	77-11188	77-11268	77-11348	77-11428	77-11505
77-11108	77-11190	77-11270	77-11350	77-11430	77-11506
77-11110	77-11192	77-11272	77-11352	77-11432	77-11507
77-11112	77-11194	77-11274	77-11354	77-11434	77-11508
77-11114	77-11196	77-11276	77-11356	77-11436	77-11510
77-11116	77-11198	77-11278	77-11358	77-11438	77-13863
77-11118	77-11200	77-11280	77-11360	77-11440	77-13864
77-11120	77-11202	77-11282	77-11362	77-11442	77-13865
77-11122	77-11204	77-11284	77-11364	77-11444	77-13866
77-11124	77-11206	77-11286	77-11366	77-11446	77-13867
77-11126	77-11208	77-11288	77-11368	77-11448	77-13868
77-11128	77-11210	77-11290	77-11370	77-11450	77-13870

EXHIBIT B
Non-Permittee Objections

77-13872	77-13934	78-10389	78-10437	78-10492	78-10539
77-13873	77-13935	78-10390	78-10438	78-10494	78-10540
77-13874	77-13936	78-10391	78-10439	78-10495	78-10541
77-13876	77-14136	78-10392	78-10440	78-10496	78-10542
77-13877		78-10393	78-10441	78-10497	78-10543
77-13879	B78	78-10394	78-10442	78-10499	78-10569
77-13880	78-04145	78-10395	78-10443	78-10500	78-10576
77-13882	78-04146	78-10396	78-10444	78-10501	78-10619
77-13883	78-04147	78-10397	78-10446	78-10502	78-10620
77-13884	78-04150	78-10398	78-10447	78-10503	78-10621
77-13885	78-04153	78-10399	78-10448	78-10504	78-10622
77-13886	78-04155	78-10400	78-10449	78-10505	78-10661
77-13887	78-04156	78-10401	78-10452	78-10506	78-10779
77-13888	78-04178	78-10402	78-10453	78-10510	78-10780
77-13889	78-04179	78-10404	78-10454	78-10511	78-10784
77-13890	78-04180	78-10405	78-10455	78-10512	78-10785
77-13891	78-04182	78-10406	78-10456	78-10514	78-10792
77-13892	78-04183	78-10407	78-10457	78-10515	78-10793
77-13893	78-04189	78-10408	78-10458	78-10516	78-10794
77-13894	78-04192	78-10409	78-10459	78-10517	78-10795
77-13895	78-04227	78-10412	78-10461	78-10518	78-10797
77-13896	78-04228	78-10414	78-10462	78-10520	78-10798
77-13897	78-04230	78-10415	78-10463	78-10521	78-10799
77-13898	78-04231	78-10416	78-10464	78-10522	78-10800
77-13899	78-04240	78-10417	78-10466	78-10523	78-10801
77-13900	78-04242	78-10418	78-10467	78-10524	78-10802
77-13901	78-04245	78-10419	78-10469	78-10525	78-10803
77-13902	78-04273	78-10420	78-10472	78-10526	78-10804
77-13903	78-04274	78-10421	78-10476	78-10527	78-10805
77-13904	78-04278	78-10422	78-10477	78-10528	78-10806
77-13905	78-04326	78-10423	78-10478	78-10529	78-10807
77-13906	78-04368	78-10424	78-10479	78-10530	78-10809
77-13907	78-04370	78-10425	78-10481	78-10531	78-10810
77-13908	78-04371	78-10426	78-10482	78-10532	78-10811
77-13909	78-10381	78-10427	78-10483	78-10533	78-10812
77-13910	78-10383	78-10428	78-10484	78-10534	78-10813
77-13911	78-10385	78-10429	78-10485	78-10535	78-10814
77-13912	78-10386	78-10430	78-10487	78-10536	78-10815
77-13914	78-10387	78-10431	78-10489	78-10537	78-10816
77-13933	78-10388	78-10432	78-10490	78-10538	78-10817

EXHIBIT B
Non-Permittee Objections

78-10818	78-10868	78-10915	78-11008	78-11992	79-04164
78-10819	78-10869	78-10918	78-11010	78-11998	79-04165
78-10820	78-10870	78-10922	78-11014	78-11999	79-04166
78-10822	78-10871	78-10924	78-11016	78-12017	79-04168
78-10823	78-10872	78-10926	78-11018	78-12019	79-04169
78-10824	78-10873	78-10928	78-11020	78-12020	79-04170
78-10825	78-10874	78-10930	78-11024	78-12021	79-04172
78-10827	78-10875	78-10932	78-11026	78-12022	79-04174
78-10828	78-10876	78-10934	78-11028	78-12023	79-04175
78-10829	78-10878	78-10938	78-11030	78-12024	79-04178
78-10830	78-10879	78-10940	78-11032	78-12025	79-04179
78-10831	78-10880	78-10942	78-11034	78-12026	79-04180
78-10834	78-10881	78-10944	78-11036	78-12027	79-04181
78-10835	78-10882	78-10945	78-11038	78-12028	79-04182
78-10839	78-10883	78-10948	78-11040	78-12029	79-04183
78-10840	78-10884	78-10950	78-11048	78-12030	79-04185
78-10841	78-10885	78-10952	78-11050	78-12032	79-04186
78-10842	78-10886	78-10954	78-11058	78-12103	79-04187
78-10843	78-10887	78-10956	78-11060		79-04190
78-10844	78-10889	78-10958	78-11062	B79	79-04191
78-10845	78-10890	78-10960	78-11064	79-02100	79-04192
78-10846	78-10891	78-10964	78-11068	79-02101	79-04193
78-10848	78-10892	78-10968	78-11074	79-02102	79-04194
78-10849	78-10893	78-10972	78-11076	79-02103	79-04195
78-10850	78-10894	78-10974	78-11078	79-04133	79-04196
78-10851	78-10895	78-10976	78-11080	79-04134	79-04198
78-10852	78-10896	78-10978	78-11086	79-04138	79-04201
78-10853	78-10897	78-10980	78-11090	79-04139	79-04202
78-10854	78-10898	78-10982	78-11092	79-04141	79-04203
78-10855	78-10899	78-10984	78-11093	79-04143	79-04204
78-10856	78-10900	78-10986	78-11094	79-04144	79-04205
78-10857	78-10901	78-10988	78-11977	79-04147	79-04206
78-10858	78-10902	78-10990	78-11978	79-04149	79-04207
78-10859	78-10904	78-10992	78-11979	79-04155	79-04208
78-10862	78-10905	78-10994	78-11981	79-04156	79-04211
78-10863	78-10906	78-10996	78-11982	79-04157	79-04212
78-10864	78-10908	78-11000	78-11983	79-04159	79-04213
78-10865	78-10910	78-11002	78-11985	79-04160	79-04215
78-10866	78-10912	78-11004	78-11988	79-04162	79-04216
78-10867	78-10913	78-11006	78-11990	79-04163	79-04217

EXHIBIT B
Non-Permittee Objections

79-04219	79-04313	79-04359	79-10483	79-10524	79-10624
79-04229	79-04315	79-04360	79-10484	79-10528	79-10625
79-04230	79-04316	79-04361	79-10485	79-10529	79-10627
79-04231	79-04317	79-04362	79-10486	79-10530	79-10629
79-04232	79-04318	79-04363	79-10487	79-10531	79-10651
79-04234	79-04319	79-04365	79-10488	79-10537	79-10652
79-04235	79-04321	79-04366	79-10489	79-10538	79-10653
79-04236	79-04322	79-04378	79-10490	79-10539	79-10654
79-04237	79-04324	79-04379	79-10491	79-10540	79-10655
79-04238	79-04325	79-04380	79-10492	79-10542	79-10657
79-04239	79-04327	79-04381	79-10493	79-10543	79-10658
79-04240	79-04328	79-04382	79-10494	79-10544	79-10659
79-04243	79-04329	79-04413	79-10495	79-10545	79-10660
79-04244	79-04330	79-04414	79-10497	79-10546	79-10661
79-04272	79-04332	79-04415	79-10498	79-10547	79-10662
79-04274	79-04333	79-04417	79-10499	79-10548	79-10663
79-04275	79-04334	79-04421	79-10500	79-10549	79-10664
79-04276	79-04335	79-07146	79-10501	79-10550	79-10665
79-04277	79-04336	79-07148	79-10502	79-10551	79-10666
79-04278	79-04337	79-10438	79-10503	79-10552	79-10667
79-04279	79-04338	79-10439	79-10504	79-10553	79-10668
79-04280	79-04339	79-10440	79-10505	79-10554	79-10669
79-04281	79-04340	79-10441	79-10506	79-10555	79-10670
79-04282	79-04341	79-10442	79-10507	79-10556	79-10671
79-04283	79-04342	79-10443	79-10508	79-10557	79-10672
79-04291	79-04343	79-10444	79-10509	79-10558	79-10673
79-04292	79-04344	79-10445	79-10510	79-10559	79-10674
79-04294	79-04345	79-10446	79-10511	79-10563	79-10677
79-04296	79-04346	79-10447	79-10512	79-10568	79-10678
79-04297	79-04347	79-10448	79-10513	79-10569	79-10679
79-04298	79-04348	79-10449	79-10514	79-10571	79-10680
79-04299	79-04350	79-10450	79-10515	79-10572	79-10683
79-04301	79-04351	79-10451	79-10516	79-10573	79-10684
79-04302	79-04352	79-10452	79-10517	79-10575	79-10692
79-04303	79-04353	79-10454	79-10518	79-10577	79-10695
79-04305	79-04354	79-10455	79-10519	79-10609	79-10700
79-04306	79-04355	79-10456	79-10520	79-10611	79-10701
79-04308	79-04356	79-10457	79-10521	79-10612	79-10702
79-04309	79-04357	79-10458	79-10522	79-10613	79-10703
79-04310	79-04358	79-10459	79-10523	79-10618	79-10704

EXHIBIT B
Non-Permittee Objections

79-10705	79-11018	79-11070	79-11115	79-11189	79-11256
79-10706	79-11019	79-11071	79-11120	79-11190	79-11257
79-10707	79-11020	79-11072	79-11122	79-11191	79-11258
79-10708	79-11021	79-11073	79-11125	79-11193	79-11259
79-10714	79-11022	79-11074	79-11135	79-11195	79-11260
79-10715	79-11023	79-11075	79-11138	79-11196	79-11261
79-10716	79-11024	79-11076	79-11139	79-11199	79-11262
79-10719	79-11025	79-11077	79-11140	79-11200	79-11263
79-10720	79-11026	79-11078	79-11143	79-11201	79-11265
79-10722	79-11027	79-11079	79-11144	79-11202	79-11266
79-10985	79-11028	79-11080	79-11148	79-11203	79-11267
79-10986	79-11030	79-11081	79-11150	79-11204	79-11269
79-10987	79-11032	79-11082	79-11151	79-11205	79-11270
79-10988	79-11033	79-11083	79-11152	79-11207	79-11271
79-10989	79-11034	79-11086	79-11153	79-11208	79-11272
79-10991	79-11035	79-11087	79-11154	79-11209	79-11273
79-10992	79-11037	79-11088	79-11155	79-11211	79-11274
79-10993	79-11039	79-11089	79-11156	79-11212	79-11275
79-10994	79-11040	79-11090	79-11157	79-11213	79-11276
79-10995	79-11041	79-11091	79-11158	79-11216	79-11277
79-10996	79-11042	79-11092	79-11160	79-11217	79-11278
79-10997	79-11043	79-11093	79-11163	79-11221	79-11279
79-10998	79-11044	79-11094	79-11164	79-11223	79-11280
79-10999	79-11047	79-11095	79-11165	79-11224	79-11281
79-11000	79-11048	79-11096	79-11167	79-11225	79-11282
79-11001	79-11049	79-11097	79-11168	79-11226	79-11283
79-11002	79-11050	79-11098	79-11169	79-11227	79-11284
79-11003	79-11051	79-11099	79-11170	79-11231	79-11285
79-11004	79-11052	79-11100	79-11172	79-11239	79-11286
79-11006	79-11053	79-11101	79-11178	79-11240	79-11287
79-11007	79-11054	79-11102	79-11179	79-11241	79-11288
79-11008	79-11055	79-11104	79-11180	79-11242	79-11291
79-11009	79-11056	79-11105	79-11181	79-11243	79-11295
79-11011	79-11059	79-11106	79-11182	79-11244	79-11299
79-11012	79-11061	79-11107	79-11183	79-11245	79-11303
79-11013	79-11062	79-11108	79-11184	79-11246	79-11304
79-11014	79-11063	79-11109	79-11185	79-11247	79-11307
79-11015	79-11064	79-11110	79-11186	79-11248	79-11310
79-11016	79-11065	79-11111	79-11187	79-11249	79-11311
79-11017	79-11067	79-11114	79-11188	79-11250	79-11312

EXHIBIT B
Non-Permittee Objections

79-11313	79-11370	79-11442	79-11496	79-11547	79-11590
79-11314	79-11372	79-11444	79-11497	79-11548	79-11591
79-11315	79-11373	79-11445	79-11498	79-11549	79-11592
79-11316	79-11374	79-11446	79-11501	79-11550	79-11593
79-11317	79-11376	79-11447	79-11502	79-11551	79-11598
79-11318	79-11377	79-11448	79-11503	79-11552	79-11600
79-11319	79-11378	79-11449	79-11504	79-11553	79-11601
79-11320	79-11379	79-11450	79-11506	79-11554	79-11603
79-11321	79-11380	79-11451	79-11507	79-11555	79-11605
79-11322	79-11383	79-11452	79-11508	79-11556	79-11608
79-11323	79-11385	79-11453	79-11509	79-11557	79-11610
79-11324	79-11386	79-11454	79-11510	79-11558	79-11612
79-11325	79-11387	79-11455	79-11511	79-11560	79-11614
79-11326	79-11388	79-11456	79-11512	79-11561	79-11616
79-11327	79-11389	79-11457	79-11513	79-11562	79-11618
79-11328	79-11391	79-11458	79-11516	79-11563	79-11620
79-11331	79-11405	79-11459	79-11517	79-11564	79-11622
79-11332	79-11408	79-11466	79-11518	79-11565	79-11624
79-11334	79-11409	79-11467	79-11521	79-11566	79-11626
79-11337	79-11410	79-11468	79-11523	79-11567	79-11628
79-11338	79-11412	79-11469	79-11524	79-11568	79-11630
79-11339	79-11414	79-11471	79-11525	79-11569	79-11632
79-11340	79-11419	79-11473	79-11527	79-11571	79-11634
79-11341	79-11420	79-11475	79-11528	79-11572	79-11636
79-11342	79-11421	79-11476	79-11529	79-11573	79-11638
79-11345	79-11422	79-11477	79-11531	79-11574	79-11640
79-11346	79-11423	79-11480	79-11532	79-11575	79-11642
79-11348	79-11424	79-11481	79-11533	79-11576	79-11644
79-11351	79-11425	79-11482	79-11534	79-11577	79-11648
79-11352	79-11427	79-11483	79-11535	79-11578	79-11650
79-11354	79-11428	79-11485	79-11536	79-11579	79-11652
79-11356	79-11429	79-11487	79-11537	79-11580	79-11654
79-11357	79-11430	79-11488	79-11538	79-11581	79-11656
79-11358	79-11431	79-11489	79-11539	79-11582	79-11658
79-11363	79-11432	79-11490	79-11540	79-11583	79-11661
79-11364	79-11434	79-11491	79-11541	79-11584	79-11662
79-11365	79-11436	79-11492	79-11542	79-11585	79-11664
79-11367	79-11439	79-11493	79-11543	79-11586	79-11666
79-11368	79-11440	79-11494	79-11544	79-11587	79-11667
79-11369	79-11441	79-11495	79-11545	79-11589	79-11668

EXHIBIT B
Non-Permittee Objections

79-11669	79-11744	79-13652	81-10359	81-11822	82-10291
79-11670	79-11745	79-13653	81-10367	81-11823	82-10292
79-11671	79-11746	79-13654	81-10368	81-11824	82-10293
79-11673	79-11749	79-13655	81-10369	81-11825	82-10294
79-11677	79-11751	79-13656	81-10370	81-11826	82-10295
79-11678	79-11753	79-13657	81-10372	81-11827	82-10296
79-11679	79-11754	79-13658	81-10373	81-11828	82-10297
79-11681	79-11755	79-13659	81-10374	81-11829	82-10298
79-11683	79-11756	79-13660	81-10375	81-11830	82-10299
79-11685	79-11760	79-13661	81-10376	81-11831	82-10300
79-11689	79-11761	79-13663	81-10377	81-11835	82-10301
79-11691	79-11762	79-13664	81-10378	81-11836	82-10303
79-11693	79-11763	79-13667	81-10379	81-11837	82-10304
79-11694	79-11764	79-13679	81-10380	81-11838	82-10305
79-11696	79-11767	79-13681	81-10381	81-11840	82-10306
79-11698	79-11768	79-13682	81-10382	81-11841	82-10307
79-11700	79-11770	79-13683	81-10388	81-11842	82-10308
79-11702	79-11771	79-13684	81-10390	81-11843	82-10309
79-11704	79-11772	79-13685	81-10392	81-11844	82-10310
79-11706	79-11773	79-13686	81-10411	81-11847	82-10311
79-11707	79-11774	79-13687	81-10413	81-11848	82-10312
79-11708	79-11779	79-13688	81-10417	81-11849	82-10313
79-11709	79-11780	79-13689	81-10447	81-11850	82-10314
79-11711	79-11782	79-13691	81-10448	81-11851	82-10315
79-11712	79-11783	79-13692	81-10451	81-11853	82-10316
79-11714	79-11784	79-13693	81-10453		82-10317
79-11716	79-13634	79-13694	81-10457	<u>B82</u>	82-10319
79-11718	79-13635	79-13695	81-10458	82-04059	82-10326
79-11720	79-13636		81-10459	82-04065	82-10347
79-11722	79-13637	<u>B81</u>	81-10524	82-04066	82-10355
79-11724	79-13639	81-10340	81-11810	82-04069	82-10358
79-11726	79-13640	81-10341	81-11811	82-04070	82-10359
79-11728	79-13641	81-10342	81-11812	82-04071	82-10366
79-11730	79-13644	81-10343	81-11813	82-04073	82-10367
79-11734	79-13645	81-10346	81-11814	82-04075	82-10369
79-11736	79-13646	81-10347	81-11815	82-10277	82-10370
79-11737	79-13647	81-10350	81-11816	82-10287	82-10371
79-11738	79-13648	81-10351	81-11817	82-10288	82-10372
79-11741	79-13649	81-10355	81-11818	82-10289	82-10373
79-11742	79-13651	81-10356	81-11821	82-10290	82-10374

EXHIBIT B
Non-Permittee Objections

82-10375	82-10433	82-10528	82-10571	82-10612	82-10653
82-10377	82-10434	82-10529	82-10572	82-10614	82-10654
82-10378	82-10436	82-10530	82-10573	82-10615	82-10655
82-10379	82-10437	82-10531	82-10574	82-10616	82-10656
82-10381	82-10438	82-10532	82-10575	82-10617	82-10657
82-10383	82-10439	82-10533	82-10576	82-10618	82-10658
82-10384	82-10440	82-10537	82-10577	82-10619	82-10659
82-10385	82-10441	82-10538	82-10578	82-10620	82-10660
82-10386	82-10442	82-10539	82-10579	82-10621	82-10661
82-10387	82-10443	82-10540	82-10580	82-10622	82-10662
82-10391	82-10447	82-10541	82-10581	82-10623	82-10663
82-10392	82-10448	82-10542	82-10582	82-10624	82-10664
82-10393	82-10449	82-10543	82-10583	82-10625	82-10665
82-10395	82-10450	82-10544	82-10584	82-10626	82-10666
82-10396	82-10452	82-10545	82-10585	82-10627	82-10667
82-10397	82-10453	82-10546	82-10586	82-10628	82-10668
82-10400	82-10454	82-10547	82-10587	82-10629	82-10669
82-10401	82-10455	82-10548	82-10589	82-10630	82-10670
82-10402	82-10456	82-10549	82-10590	82-10631	82-10671
82-10403	82-10457	82-10550	82-10591	82-10632	82-10672
82-10406	82-10459	82-10551	82-10592	82-10633	82-10674
82-10410	82-10460	82-10552	82-10593	82-10634	82-10675
82-10411	82-10461	82-10553	82-10594	82-10635	82-10676
82-10412	82-10462	82-10554	82-10595	82-10636	82-10677
82-10414	82-10468	82-10555	82-10596	82-10637	82-10678
82-10415	82-10469	82-10556	82-10597	82-10638	82-10679
82-10417	82-10470	82-10557	82-10598	82-10639	82-10680
82-10419	82-10471	82-10558	82-10599	82-10640	82-10681
82-10420	82-10472	82-10559	82-10600	82-10641	82-10682
82-10421	82-10473	82-10560	82-10601	82-10642	82-10683
82-10422	82-10474	82-10561	82-10602	82-10643	82-10684
82-10423	82-10475	82-10562	82-10603	82-10644	82-10685
82-10424	82-10476	82-10563	82-10604	82-10645	82-10686
82-10425	82-10477	82-10564	82-10605	82-10646	82-10687
82-10426	82-10478	82-10565	82-10606	82-10647	82-10688
82-10428	82-10479	82-10566	82-10607	82-10648	82-10689
82-10429	82-10480	82-10567	82-10608	82-10649	82-10690
82-10430	82-10481	82-10568	82-10609	82-10650	82-10691
82-10431	82-10482	82-10569	82-10610	82-10651	82-10692
82-10432	82-10527	82-10570	82-10611	82-10652	82-10693

EXHIBIT B
Non-Permittee Objections

82-10694	82-10740	82-10782	82-10825	82-10865	82-10905
82-10695	82-10741	82-10783	82-10826	82-10866	82-10906
82-10696	82-10742	82-10784	82-10827	82-10867	82-10907
82-10697	82-10743	82-10785	82-10828	82-10868	82-10908
82-10698	82-10744	82-10786	82-10829	82-10869	82-10909
82-10699	82-10745	82-10787	82-10830	82-10870	82-10910
82-10700	82-10746	82-10788	82-10831	82-10871	82-10911
82-10701	82-10747	82-10789	82-10832	82-10872	82-10912
82-10702	82-10748	82-10792	82-10833	82-10873	82-10913
82-10703	82-10749	82-10793	82-10834	82-10874	82-10914
82-10704	82-10750	82-10794	82-10835	82-10875	82-10915
82-10705	82-10751	82-10795	82-10836	82-10876	82-10916
82-10707	82-10752	82-10796	82-10837	82-10877	82-10917
82-10708	82-10753	82-10798	82-10838	82-10878	82-10918
82-10709	82-10754	82-10799	82-10839	82-10879	82-10919
82-10710	82-10755	82-10800	82-10840	82-10880	82-10920
82-10711	82-10756	82-10801	82-10841	82-10881	82-10923
82-10713	82-10757	82-10802	82-10842	82-10882	82-10924
82-10714	82-10758	82-10803	82-10843	82-10883	82-10925
82-10715	82-10759	82-10804	82-10844	82-10884	82-10926
82-10716	82-10760	82-10805	82-10845	82-10885	82-10927
82-10717	82-10761	82-10806	82-10846	82-10886	82-10928
82-10718	82-10762	82-10807	82-10847	82-10887	82-10929
82-10719	82-10764	82-10808	82-10848	82-10888	82-10930
82-10720	82-10765	82-10809	82-10849	82-10889	82-10931
82-10722	82-10766	82-10810	82-10850	82-10890	82-10932
82-10723	82-10767	82-10811	82-10851	82-10891	82-10933
82-10726	82-10768	82-10812	82-10852	82-10892	82-10934
82-10727	82-10769	82-10813	82-10853	82-10893	82-10935
82-10729	82-10770	82-10814	82-10854	82-10894	82-10936
82-10730	82-10771	82-10815	82-10855	82-10895	82-10937
82-10731	82-10772	82-10816	82-10856	82-10896	82-10938
82-10732	82-10773	82-10817	82-10857	82-10897	82-10939
82-10733	82-10774	82-10818	82-10858	82-10898	82-10940
82-10734	82-10775	82-10819	82-10859	82-10899	82-10941
82-10735	82-10776	82-10820	82-10860	82-10900	82-10942
82-10736	82-10778	82-10821	82-10861	82-10901	82-11979
82-10737	82-10779	82-10822	82-10862	82-10902	82-11980
82-10738	82-10780	82-10823	82-10863	82-10903	82-11981
82-10739	82-10781	82-10824	82-10864	82-10904	82-11982

EXHIBIT B
Non-Permittee Objections

82-11983	83-10198	83-10336	83-10418	83-10518	83-10604
82-11984	83-10202	83-10338	83-10420	83-10520	83-10606
82-11985	83-10210	83-10340	83-10422	83-10522	83-10608
82-11986	83-10211	83-10342	83-10424	83-10524	83-10610
82-11987	83-10214	83-10344	83-10426	83-10526	83-10612
82-11988	83-10226	83-10346	83-10428	83-10528	83-10614
82-11990	83-10266	83-10348	83-10430	83-10530	83-10616
82-11991	83-10268	83-10350	83-10432	83-10532	83-10618
82-11992	83-10270	83-10352	83-10434	83-10534	83-10620
82-11993	83-10272	83-10354	83-10436	83-10536	83-10622
82-11994	83-10274	83-10356	83-10438	83-10538	83-10624
82-11995	83-10276	83-10358	83-10440	83-10540	83-10626
82-11996	83-10278	83-10360	83-10442	83-10542	83-10628
82-11997	83-10280	83-10364	83-10448	83-10544	83-10630
82-11998	83-10282	83-10366	83-10452	83-10546	83-10632
82-12000	83-10284	83-10368	83-10454	83-10548	83-10634
82-12001	83-10286	83-10370	83-10458	83-10550	83-10636
82-12002	83-10288	83-10372	83-10460	83-10552	83-10638
82-12004	83-10290	83-10374	83-10462	83-10554	83-10640
82-12006	83-10292	83-10376	83-10464	83-10556	83-10642
	83-10294	83-10378	83-10466	83-10558	83-10644
<u>B83</u>	83-10296	83-10380	83-10472	83-10560	83-10646
83-04045	83-10298	83-10382	83-10474	83-10562	83-10648
83-04049	83-10300	83-10384	83-10476	83-10564	83-10650
83-04051	83-10304	83-10386	83-10482	83-10566	83-10652
83-04059	83-10306	83-10388	83-10484	83-10568	83-10654
83-10155	83-10308	83-10390	83-10486	83-10570	83-10656
83-10156	83-10310	83-10392	83-10488	83-10572	83-10658
83-10157	83-10312	83-10394	83-10490	83-10574	83-10662
83-10158	83-10314	83-10396	83-10492	83-10576	83-10664
83-10159	83-10316	83-10398	83-10494	83-10578	83-10666
83-10167	83-10318	83-10400	83-10496	83-10580	83-10668
83-10169	83-10320	83-10402	83-10498	83-10584	83-10670
83-10181	83-10322	83-10404	83-10502	83-10586	83-10672
83-10182	83-10324	83-10406	83-10506	83-10590	83-10674
83-10188	83-10326	83-10408	83-10508	83-10592	83-10676
83-10189	83-10328	83-10410	83-10510	83-10594	83-10680
83-10194	83-10330	83-10412	83-10512	83-10596	83-10682
83-10195	83-10332	83-10414	83-10514	83-10598	83-10684
83-10196	83-10334	83-10416	83-10516	83-10600	83-10686

EXHIBIT B
Non-Permittee Objections

83-10688	83-10770	84-10872	84-11986	84-12029	85-11826
83-10690	83-10773	84-10873	84-11988	84-12030	85-11827
83-10694	83-10774	84-11910	84-11989	84-12031	85-11828
83-10696	83-10775	84-11911	84-11990	84-12032	85-11829
83-10698	83-10776	84-11912	84-11991	84-12033	85-11831
83-10700	83-10777	84-11913	84-11992	84-12034	85-11832
83-10702	83-10778	84-11914	84-11993	84-12035	85-11834
83-10704	83-10779	84-11915	84-11994	84-12036	85-11835
83-10706	83-10780	84-11920	84-11995	84-12037	85-11836
83-10708	83-10781	84-11922	84-11996	84-12038	85-11837
83-10710	83-10782	84-11923	84-11997	84-12040	85-11838
83-10712	83-10783	84-11924	84-11998	84-12043	85-11839
83-10714	83-10784	84-11925	84-11999	84-12044	85-11840
83-10716	83-10785	84-11928	84-12000	84-12045	85-11841
83-10718	83-11879	84-11934	84-12001	84-12046	85-11842
83-10720	83-11903	84-11936	84-12002	84-12047	85-11845
83-10722	83-11904	84-11938	84-12003	84-12048	85-11846
83-10724	83-11907	84-11940	84-12004	84-12049	85-11847
83-10726	83-11909	84-11942	84-12005	84-12050	85-11849
83-10728	83-11910	84-11944	84-12006	84-12051	85-11851
83-10730	83-11911	84-11946	84-12007	84-12052	85-11852
83-10732	83-11912	84-11948	84-12008	84-12053	85-11853
83-10734	83-11913	84-11952	84-12009	84-12057	85-11854
83-10736	83-11915	84-11954	84-12010	84-12061	85-11855
83-10738	83-11916	84-11956	84-12011	84-12063	85-11856
83-10740	83-11917	84-11958	84-12012		85-11857
83-10742	83-11919	84-11971	84-12013	<u>B85</u>	85-11858
83-10744	83-11920	84-11972	84-12015	85-11812	85-11859
83-10746	83-11921	84-11973	84-12016	85-11813	85-11860
83-10748		84-11974	84-12017	85-11814	85-11861
83-10750	<u>B84</u>	84-11976	84-12018	85-11815	85-11862
83-10752	84-10862	84-11977	84-12019	85-11816	85-11863
83-10754	84-10863	84-11978	84-12020	85-11817	85-11864
83-10756	84-10864	84-11979	84-12021	85-11818	85-11865
83-10758	84-10865	84-11980	84-12022	85-11820	85-11866
83-10760	84-10867	84-11981	84-12024	85-11821	85-11867
83-10762	84-10868	84-11982	84-12025	85-11822	85-11868
83-10764	84-10869	84-11983	84-12026	85-11823	85-11869
83-10766	84-10870	84-11984	84-12027	85-11824	85-11870
83-10768	84-10871	84-11985	84-12028	85-11825	85-11871

EXHIBIT B
Non-Permittee Objections

85-11872	85-11964	85-12006	85-12050	85-12109	85-12162
85-11873	85-11965	85-12007	85-12051	85-12110	85-12164
85-11874	85-11966	85-12008	85-12052	85-12111	85-12165
85-11875	85-11967	85-12009	85-12055	85-12112	85-12167
85-11876	85-11968	85-12010	85-12056	85-12113	85-12168
85-11877	85-11969	85-12011	85-12057	85-12114	85-12169
85-11878	85-11970	85-12012	85-12058	85-12115	85-12170
85-11879	85-11971	85-12013	85-12059	85-12117	85-12171
85-11880	85-11972	85-12014	85-12060	85-12118	85-12172
85-11881	85-11973	85-12015	85-12061	85-12119	85-12173
85-11882	85-11974	85-12016	85-12064	85-12120	85-12174
85-11883	85-11975	85-12017	85-12065	85-12126	85-12175
85-11884	85-11976	85-12018	85-12066	85-12127	85-12176
85-11885	85-11977	85-12020	85-12067	85-12128	85-12177
85-11886	85-11978	85-12021	85-12068	85-12129	85-12178
85-11920	85-11979	85-12022	85-12069	85-12130	85-12180
85-11924	85-11980	85-12023	85-12070	85-12131	85-12181
85-11928	85-11982	85-12024	85-12071	85-12132	85-12182
85-11930	85-11983	85-12025	85-12072	85-12133	85-15209
85-11932	85-11984	85-12026	85-12074	85-12134	85-15210
85-11934	85-11985	85-12027	85-12075	85-12135	85-15211
85-11936	85-11986	85-12028	85-12076	85-12137	85-15212
85-11938	85-11987	85-12029	85-12077	85-12138	85-15213
85-11940	85-11988	85-12030	85-12078	85-12141	85-15214
85-11942	85-11989	85-12031	85-12085	85-12143	85-15215
85-11944	85-11990	85-12032	85-12086	85-12145	85-15216
85-11946	85-11991	85-12033	85-12087	85-12146	85-15217
85-11950	85-11992	85-12034	85-12088	85-12147	85-15218
85-11951	85-11993	85-12035	85-12089	85-12148	85-15219
85-11952	85-11994	85-12036	85-12091	85-12149	85-15220
85-11953	85-11995	85-12037	85-12094	85-12150	85-15221
85-11954	85-11996	85-12038	85-12096	85-12152	85-15222
85-11955	85-11997	85-12040	85-12097	85-12153	85-15223
85-11956	85-11998	85-12041	85-12101	85-12154	85-15224
85-11957	85-11999	85-12042	85-12102	85-12155	85-15225
85-11958	85-12000	85-12043	85-12103	85-12156	85-15226
85-11959	85-12001	85-12045	85-12104	85-12157	85-15227
85-11960	85-12002	85-12046	85-12105	85-12158	85-15228
85-11962	85-12003	85-12047	85-12106	85-12160	85-15229
85-11963	85-12004	85-12049	85-12107	85-12161	85-15230

EXHIBIT B
Non-Permittee Objections

85-15231	86-10742	86-10856
85-15232	86-10743	86-10858
85-15233	86-10744	86-10859
85-15234	86-10745	86-10860
85-15235	86-10746	86-11784
85-15236	86-10747	86-11785
85-15237	86-10748	86-11786
85-15238	86-10750	86-11787
85-15239	86-10756	86-11788
85-15240	86-10757	86-11790
85-15241	86-10758	
85-15242	86-10759	
85-15244	86-10760	
85-15245	86-10761	
85-15246	86-10762	
85-15247	86-10763	
85-15248	86-10807	
85-15249	86-10808	
85-15250	86-10810	
85-15251	86-10815	
85-15252	86-10816	
85-15253	86-10822	
85-15254	86-10823	
85-15255	86-10824	
85-15256	86-10825	
85-15258	86-10826	
85-15259	86-10827	
85-15260	86-10828	
85-15261	86-10829	
85-15264	86-10831	
85-15265	86-10832	
85-15266	86-10833	
85-15267	86-10834	
	86-10841	
B86	86-10843	
86-04096	86-10850	
86-04097	86-10851	
86-04099	86-10852	
86-04100	86-10854	
86-04106	86-10855	

EXHIBIT C
Permittees' Set-Aside Motions Pending

45-02800 BLM	45-12277 USFS	47-15014 USFS
45-02804 BLM	45-12281 USFS	47-15016 USFS
45-02805 BLM	45-12282 USFS	47-15017 USFS
45-04134 BLM	45-12283 USFS	47-15018 USFS
45-04136 BLM	45-12284 USFS	47-15021 USFS
45-12069 USFS	45-12285 USFS	47-15022 USFS
45-12110 USFS	45-12286 USFS	47-15029 USFS
45-12118 USFS	45-12287 USFS	47-15030 USFS
45-12119 USFS	45-12288 USFS	47-15036 USFS
45-12129 USFS	45-12292 USFS	47-16670 USFS
45-12131 USFS	45-12293 USFS	47-16689 USFS
45-12176 USFS	45-12294 USFS	47-16690 USFS
45-12177 USFS	45-12295 USFS	47-16691 USFS
45-12178 USFS	45-12296 USFS	47-16712 USFS
45-12179 USFS	45-12297 USFS	47-16723 USFS
45-12182 USFS	45-12298 USFS	
45-12220 USFS	45-12299 USFS	
45-12221 USFS	45-12300 USFS	
45-12222 USFS	45-12668 BLM	
45-12224 USFS	45-12805 BLM	
45-12226 USFS	45-12844 USFS	
45-12227 USFS	45-12852 USFS	
45-12230 USFS	45-12853 USFS	
45-12231 USFS	45-12854 USFS	
45-12232 USFS	45-12858 USFS	
45-12237 USFS	45-12859 USFS	
45-12238 USFS	45-12862 USFS	
45-12245 USFS	45-12868 USFS	
45-12246 USFS	47-02594 BLM	
45-12247 USFS	47-02632 BLM	
45-12256 USFS	47-07596 USFS	
45-12263 USFS	47-07597 USFS	
45-12264 USFS	47-07598 USFS	
45-12267 USFS	47-07602 USFS	
45-12269 USFS	47-08030 USFS	
45-12270 USFS	47-08051 USFS	
45-12271 USFS	47-14996 USFS	
45-12273 USFS	47-14998 USFS	
45-12274 USFS	47-15012 USFS	
45-12275 USFS	47-15013 USFS	

EXHIBIT D
U.S. Unreported Claims

37-20293 BLM
37-20294 BLM
37-20295 BLM
37-20302 BLM
37-20305 BLM
37-20306 BLM
37-20308 BLM
37-20309 BLM
37-20310 BLM
37-20311 BLM
37-20312 BLM
37-20313 BLM

45-07387 USFS
45-07388 USFS
45-07390 USFS
45-07396 USFS
45-07569 USFS
45-07593 USFS
45-12920 BLM
45-12921 BLM
45-12922 BLM
45-12923 BLM
45-12924 BLM
45-12926 BLM
45-13483 BLM
45-12484 BLM

47-00060B BLM

EXHIBIT E
Permittees' Reported Claims

37-10606 Faulkner Land and Livestock Company, Diamond A Livestock Inc.

45-10332 Winslow Whiteley, Bruce Bedke, Gary Russel Poulton, Ray C. Bedke

47-14923A Winslow Whiteley, Bruce Bedke, Gary Russel Poulton, Ray C. Bedke

47-14923B Winslow Whiteley, Bruce Bedke, Gary Russel Poulton, Ray C. Bedke

47-14923C Winslow Whiteley, Bruce Bedke, Gary Russel Poulton, Ray C. Bedke

47-14923D Winslow Whiteley, Bruce Bedke, Gary Russel Poulton, Ray C. Bedke

47-14923E Winslow Whiteley, Bruce Bedke, Gary Russel Poulton, Ray C. Bedke

47-14945 Pickett Ranch and Sheep Company

47-12383 Western Stockgrowers Association et al.

47-16728 Western Stockgrowers Association et al.

47-16729 Western Stockgrowers Association et al.

47-16730 Western Stockgrowers Association et al.

47-16731 Western Stockgrowers Association et al.

47-16732 Western Stockgrowers Association et al.

47-16733 Western Stockgrowers Association et al.

47-16734 Western Stockgrowers Association et al.

47-16735 Western Stockgrowers Association et al.

47-16736 Western Stockgrowers Association et al.

47-16737 Western Stockgrowers Association et al.

47-16738 Western Stockgrowers Association et al.

47-16739 Western Stockgrowers Association et al.

47-16740 Western Stockgrowers Association et al.

47-16741 Western Stockgrowers Association et al.

47-16742 Western Stockgrowers Association et al.

47-16743 Western Stockgrowers Association et al.

47-16744 Western Stockgrowers Association et al.

47-16745 Western Stockgrowers Association et al.

47-16746 Western Stockgrowers Association et al.

47-16747 Western Stockgrowers Association et al.

47-16748 Western Stockgrowers Association et al.

47-16749 Western Stockgrowers Association et al.

47-16750 Western Stockgrowers Association et al.

47-16752 Western Stockgrowers Association et al.

47-16753 Western Stockgrowers Association et al.

EXHIBIT E
Permittees' Reported Claims

67-11043 James Eckhardt
67-11045 James Eckhardt
67-11059 James Eckhardt

67-14083 Weldon Branch

69-10049 Lawrence Ranch Inc.

78-10002 Lester Lowe/Todd Bowen

78-10338 Shingle Creek LLC
78-10339 Shingle Creek LLC
78-10340 Shingle Creek LLC

EXHIBIT F
Permittees' Unreported Claims

Bedke

<u>Basin Number</u>	<u>Sequence Number</u>
45	634
45	678
45	4050
45	10325
45	10327
45	10329
45	10330
45	10331
45	10332
45	10333
45	10334
45	10335
45	10336
45	10492
45	10500
45	10505
45	10507
45	10508
45	10784
45	10791
45	10792
45	10793
45	10794
45	12765
45	12766
45	12767
45	12891
45	12910
47	14924

Branch

<u>Basin Number</u>	<u>Sequence Number</u>
67	7302

Faulkner Land and Livestock

<u>Basin Number</u>	<u>Sequence Number</u>
37	10597
63	15055

EXHIBIT F
Permittees' Unreported Claims

Flying Triangle

<u>Basin Number</u>	<u>Sequence Number</u>
37	20404
37	20453
37	20454
37	20455
37	20456
37	20457
37	20458
37	20459
37	20460
37	20461
37	20462
37	20463
37	20465
37	20466
37	20467
37	20468
37	20469
37	20470
37	20471
37	20472
37	20474
37	20475
37	20476
37	20477
37	20478
37	20479
37	20480
37	20481
37	20482
37	20483
37	20484
37	20485
37	20486
37	20487
37	20488
37	20489

EXHIBIT F
Permittees' Unreported Claims

Picket Ranch & Sheep Co.

<u>Basin Number</u>	<u>Sequence Number</u>
45	2766
45	10832
45	10833
45	10834
45	10835
45	10836
45	12446
45	12894
45	14945
47	10835

Poulton

<u>Basin Number</u>	<u>Sequence Number</u>
45	152
45	10325
45	10327
45	10329
45	10330
45	10331
45	10334
45	10335
45	10336
45	10338
45	12747
45	12893
47	14924
63	31225

Shingle Creek LLC

<u>Basin Number</u>	<u>Sequence Number</u>
78	12109
78	12110
78	12111
78	12112
78	12113
78	12114
78	12115
78	12116

EXHIBIT F
Permittees' Unreported Claims

Shoulder 3 Ranch

<u>Basin Number</u>	<u>Sequence Number</u>
45	152
45	7335
45	10352
45	10353
45	10354
45	10355
45	10356
45	10357
45	10358
45	10359
45	10454
45	10471
45	10474
45	12751
45	13488

Tugaw

<u>Basin Number</u>	<u>Sequence Number</u>
45	12586
45	12588
45	12896
45	12897
45	12898
45	12899
45	12900
45	12901
45	12902
45	12903
45	12904
45	12905

EXHIBIT F
Permittees' Unreported Claims

Whiteley

<u>Basin Number</u>	<u>Sequence Number</u>	<u>Split Suffix</u>
45	77	W
45	78	P
45	79	Q
45	2263	
45	2309	
45	2444	
45	2547	
45	2656	
45	10325	
45	10327	
45	10329	
45	10330	
45	10331	
45	10335	
45	10336	
45	10414	
45	10467	
45	10474	
47	14924	

Winecup Inc.

<u>Basin Number</u>	<u>Sequence Number</u>
45	10333
45	10334
45	13494

EXHIBIT G

Permittees' Claims Yet to be Filed

Claimant

Allotment/Source

A.L. Cattle

Willow Ridge AMP (Dry Creek Pasture, George Way Pasture, Power Line Pasture)
sources: the following creeks: Willow, Jakes, Coonrod, George Way, Four Mile, Succor, and Rock.

Sheep Creek Allotment
source: South Fork Sheep Creek

Tommy Carr Allotment
source: one spring

Flying Triangle

Notch Butte Allotment

JOSHUA D. HURWIT, Idaho State Bar No. 9527
United States Attorney, District of Idaho
CHRISTINE ENGLAND, Idaho State Bar No. 11390
Assistant United States Attorney, District of Idaho
1290 West Myrtle Street, Suite 500
Boise, ID 83702
Tel: (208) 334-1211; Fax: (208) 334-9375
Christine.England@usdoj.gov

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice
STEPHEN G. BARTELL, Colorado Bar No. 21760
Assistant Section Chief, Natural Resources Section
stephen.bartell@usdoj.gov
DAVID L. NEGRI, Idaho State Bar No. 6997
Trial Attorney, Natural Resources Section
c/o U.S. Attorney's Office
1290 West Myrtle Street, Suite 500
Boise, ID 83702
Tel: (208) 334-1936; Fax: (208) 334-1414
david.negri@usdoj.gov

THOMAS K. SNODGRASS, Colorado Bar No. 31329
Senior Attorney, Natural Resources Section
999 18th Street, South Terrace, Suite 370
Denver, CO 80202
Telephone: 303-844-7233; Fax: 303-844-1350
thomas.snodgrass@usdoj.gov
Counsel for Plaintiff United States of America

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

UNITED STATES OF AMERICA,) Case No. 1:22-cv-00236-DCN
)
Plaintiff,)
)
v.) **DECLARATION OF KATHRYN J.**
) **CONANT**
)
STATE OF IDAHO; IDAHO DEPARTMENT)
OF WATER RESOURCES, an agency of the)
State of Idaho; and GARY SPACKMAN, in his)
official capacity as Director of the Idaho)
Department of Water Resources,)
)
Defendants,)
)

v.

IDAHO HOUSE OF REPRESENTATIVES;
MIKE MOYLE, in his official capacity as
Majority Leader of the House; IDAHO
SENATE; and CHUCK WINDER, in his official
capacity as President Pro Tempore of the
Senate,

Intervenor-Defendants.

)
)
)
)
)
)
)
)
)
)
)
)
)

I, Kathryn J. Conant, in accordance with the requirements of 28 U.S.C. § 1746 declare:

1. My name is Kathryn Jeanne Conant, I am an employee of the United States Department of Agriculture (“USDA”), Forest Service (“Forest Service”). The following statements are based upon my personal knowledge.
2. My present position is that of Lands and Minerals Director for the USDA Forest Service Intermountain Region. I have served in this position since June 2012.
3. In this capacity, my current responsibilities include overseeing all water right issues for the Forest Service in Central/Southern Idaho, Nevada, Utah, western Wyoming, a portion of California, and a portion of Colorado. This includes exercising delegated authority for most water rights actions, as well as overseeing the Forest Service’s participation in general water right adjudications in Idaho, which have included the Snake River Basin Adjudication (“SRBA”) and the Bear River Basin Adjudication.
4. Signatory authority for most water rights actions has been delegated to the Lands and Minerals Director as defined in the Regional Manual Supplement (*see* FSM 2500-2007-1). Also delegated to the Director is the responsibility to retain and maintain original permanent water rights files for the Intermountain Region.
5. I provide direction, oversight, and decisions as these pertain to our management of water resources with emphasis on federally owned water rights held for the benefit of the Forest Service and water uses of others on National Forest System (“NFS”) lands. My position also directs and helps evaluate the regional water rights program, and develops and disseminates applicable policy, procedures, and protocols for the program. I ensure coordination of program components with other staff groups, external organizations, other Federal, State, and local

agencies, and the USDA Office of the General Counsel. I am also responsible for the study of new or modified legislative or regulatory requirements and agency objectives and for formulating policies and approaches for managing the watershed rights in the Intermountain Region.

6. I work closely with representatives from Federal, State, and municipal organizations, non-government organizations, and private industries to develop long term management solutions for water rights within the Intermountain Region. I have developed and revised national procedures, technical standards, and guidelines for water rights and water uses. I review proposed and revised national policy directives, provide constructive input, and ensure consistency with regional programs and objectives. I also serve as a regional consultant and I work closely with our USDA Office of the General Counsel, Forest Supervisors, and program specialists in providing advice and interpretation on complex problems relating to the resolution and negotiation of water rights and instream flow issues for National Forests, NFS lands, and adjacent State and private forest lands. I oversee programs to secure Forest Service water rights and to prevent inappropriate water uses or claims by others that could have adverse impacts on water resources on the National Forests. In addition, I provide direction and guidance in the development and implementation of a water rights management strategy. Components of such a strategy may include legal, regulatory, legislative, and programmatic approaches.

7. I have been employed by the Federal government since 1995, and with the Forest Service since 2003. My federal career includes service in the following positions:

- a. Almost five years as a biologist for the U.S. Army Corps of Engineers, out of the Baltimore District. During my tenure, I worked on water resource management projects within the Potomac and Susquehanna River Basins.

- b. Almost four years as a biologist working for National Marine Fisheries Service within National Oceanic and Atmospheric Administration primarily focused on Federal Energy Regulatory Commission's hydropower licensing program.
- c. Nine years with the U.S. Forest Service, managing the national Forest Legacy Program within State and Private Forestry.
- d. Ten years in my current role as Lands and Minerals Regional Director for the Forest Service.

8. The United States holds approximately 9,000 decreed stockwater rights on NFS lands in the State of Idaho; the Forest Service administers such rights located on grazing allotments on NFS lands in order to benefit the grazing program and for use by grazing permittees, and in some instances to benefit wildlife. Forest Service administration of these stockwater rights has the important benefit of allowing efficient use of water resources by multiple or successive grazing permittees on the same allotment. It also prevents one permittee from excluding one or multiple other permittees' use on the same allotment, and from transferring a water right away from an allotment onto other land, hindering water use on an allotment by multiple and successive permittees and by wildlife.

9. In my capacity as Intermountain Region Lands and Minerals Director, I participated in and observed the later phases of the SRBA. The SRBA was commenced in 1987; the Court issued a Final Unified Decree in 2014. The SRBA encompassed 87% of the State of Idaho. Four smaller adjudications are currently active in the remainder of the State for the Coeur d'Alene-Spokane River, the Palouse River, the Bear River, and the Clark Fork-Pend Oreille River systems.

10. The Forest Service established a team known as the Boise Adjudication Team in 1993, extending across multiple offices and programs, to defend existing licensed and statutory water rights obtained under state law, and to prepare constitutional claims¹ for all water use occurring on NFS lands, including stockwater. This Team served both the Intermountain Region and Northern Region of the Forest Service through 2014.

11. After commencement of the SRBA, the SRBA Court issued an order establishing procedures for the adjudication of small domestic and stockwater claims.

- a. The Forest Service filed thousands of stockwater claims for the benefit of the grazing program and for use by grazing permittees.
- b. This action was communicated to grazing permit holders, many of whom communicated thanks that the Forest Service was working to secure stockwater rights for use on allotments.
- c. Most permittees chose not to file their own stockwater claims in situations where the Forest Service had filed claims for use on those allotments.
- d. Of approximately 1,020 grazing permit holders on NFS lands within the SRBA, only 20 filed competing claims. Those contested cases were resolved in 2002 in a stipulated settlement where both the Forest Service and the permittees received decrees for the stockwater use.

12. In 2014, the SRBA Final Unified Decree was signed and included nearly 9,000 stockwater rights decreed to the USDA Forest Service. Over half of the water sources for those decreed rights have been developed by the Forest Service, with significant investments in

¹ “Constitutional rights” were created by putting water to beneficial use without obtaining a prior permit or license from the Idaho Department of Water Resources (“IDWR”).

troughs, pipes, tanks, wells, and other infrastructure. The Forest Service likely would not have made such investments without being able to rely on the certainty afforded by holding these decreed water rights.

13. The certainty and finality of the SRBA Final Unified Decree allowed the Forest Service to manage its Range Management Program on NFS lands, providing access to stockwater resources for the benefit of permittees.

14. Beginning in 2017, the Idaho Legislature made a series of changes to Idaho water statutes related to forfeiture of federally held water rights that put at risk the Forest Service's decreed and other stockwater rights and that have significant impacts on the Forest Services' ability to manage the federal grazing program on National Forest System lands.

15. Pursuant to these new Idaho laws, on June 22, 2022, the Director of IDWR issued an order to the Forest Service to show cause ("Order to Show Cause") why 11 stockwater rights held by the United States on behalf of the Forest Service should not be forfeited.

- a. The Order to Show Cause was based on a petition filed by Jaycob J. and Sheyenne A. Smith, the sole grazing permit holder on the Fourth of July Creek No. 70213 Allotment on the Salmon-Challis National Forest. The petition sought to forfeit water rights held by the United States located on that allotment.
- b. Of the 11 stockwater rights subject to the Order to Show Cause, seven were decreed by the SRBA Court to the United States on behalf of the Forest Service (75-11102, 75-13808, 75-13813, 75-13822, 75-13826, 75-13899, and 75-13912), three were licensed to the United States pursuant to Idaho law by IDWR (75-7279, 75-7288, and 75-7335), and one was the subject of a statutory claim qualifying for the SRBA *de minimis* stockwater claims deferral option (75-4241).

Pursuant to the provisions of 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 7, 2022



Kathryn Jeanne Conant
Kathryn Jeanne Conant
Land and Minerals Director
U.S. Forest Service
Intermountain Region