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DEPARTMENT OF  
WATER RESOURCES

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*Attorneys for South Valley Ground Water District*

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

IN THE MATTER OF BASIN 37  
ADMINISTRATIVE PROCEEDING

Docket No. AA-WRA-2021-001


**SOUTH VALLEY GROUND  
WATER DISTRICT'S  
REQUEST FOR PRODUCTION**

COMES NOW, the SOUTH VALLEY GROUND WATER DISTRICT (“SVGWD”), by and through its attorneys of record, BARKER ROSHOLT & SIMPSON LLP, and hereby requests the the Department of Water Resources respond to this request for production of information. SVGWD requests production of this information related to the *Notice of Administrative Proceeding, Pre-Hearing Conference, and Hearing* (“Notice”) issued by the Director of the Idaho Water Resources Board on May 4, 2021, and conjunctive management of certain groundwater rights in a portion of Basin 37. This information is relevant to the hydrology and water rights that are subject to the Director’s *Notice* of potential curtailment and critical for SVGWD and its members to prepare for the hearing.

To wit, SVGWD makes specific requests for production of records and information as more fully described in Exhibit A. This request is in addition to the information that the Director's May 11, 2021 *Request for Staff Memorandum*, required to be produced. To the extent that the information contained in answering these requests is included in the information provided in IDWR's response to the Director's May 11, 2021 *Request for Staff Memorandum*, SVGWD requests that the Department identify where the response to the request can be found in the forthcoming Staff Memorandum, and if not in the Staff Memorandum, responses should be answered in full.

Dated this 13<sup>th</sup> day of May, 2021.

BARKER ROSHOLT & SIMPSON LLP



Albert P. Barker

*Attorney for South Valley Ground Water District*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13<sup>th</sup> day of May, 2021, the foregoing was filed, served, and copied as shown below.

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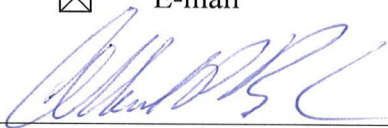
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Albert P. Barker

1. All Orders issued under IC 42-237a.g involving curtailment of groundwater to prevent injury to surface water rights.
2. All IDWR guidance concerning the authority of the Director or IDWR under 42-237a.g.
3. The basis for the decision to direct the proposed administration at those groundwater rights within the boundary of the map, including the basis for selecting the boundary as shown on the inset map to the Notice.
4. The Director stated at an Advisory Committee meeting in April that he had enough information to make an injury determination. Produce the information that the Director relied upon or was available to the Director in making that statement.
5. Any additional information relevant to injury analysis generated since the Director's statement.
  - a. Including water rights that may be injured, and for each water right the factors listed in Rule 42 of the Conjunctive Management Rules
  - b. If the spreadsheet analysis dated April 14 &/or April 15, 2021 from Watermaster Kevin Lakey is relied upon, provide a full explanation of the spreadsheets and all backup data and calculations used to prepare the spreadsheets.
  - c. Provide all additional information and injury analysis prepared by or obtained from the Watermaster Kevin Lakey or the watermaster's office.
6. Identify all water rights the Department considers may be injured and the basis for that conclusion
7. Provide the methodology used to quantify the surface water supply for the Little Wood River downstream of Silver Creek in 2021.
8. Describe the impact of Condition 161 on water deliveries in the Little Wood in the 2021 water year, including identification of those rights with that condition.
9. All communications concerning water supply and injury analysis with any water right holder and their representatives, including Eric Miller and counsel, whose rights the Department considers may be injured concerning injury analysis
10. All injury analysis conducted by IDWR for this proceeding
11. All communication with the Basin 37 Water Master regarding injury analysis and water supply
12. All analysis of curtailment necessary to avoid injury
  - a. All analysis using the WRV 1.1 Ground Water Model including model runs, supporting data and documentation utilized to determine the administrative area identified on Attachment A to the Basin 37 Administrative Proceeding Order.
  - b. All analysis using the WRV 1.1 Ground Water Model including model runs, supporting data and documentation utilized to identify ground water rights to be reduced or curtailed in 2021.
  - c. All analysis including model runs, supporting data and documentation using the WRV 1.1 Ground Water Model to quantify the benefit to the Little Wood River water users from proposed reductions in ground water withdrawals in 2021.

13. 2021 communications (including phone logs, texts, emails and other written documents) with members of the Idaho legislature and Idaho Water Resource Board concerning about water supply, injury, curtailment and this administrative proceeding.
14. Quantify the impact of the channel condition of Silver Creek upstream of Highway 93. Explain how the channel condition impacts the water supply for the downstream Little Wood River water users. Produce all analysis of water losses to Silver Creek at the Highway 93 crossing.
15. Produce all documentation of the deterioration of the stream conditions in Silver Creek at Highway 93 and increases in stream losses at this location.
16. Provide documentation to support any determination concerning the responsibility for maintaining the stream channel in Silver Creek at Highway 93.
17. Provide all communication to the Department requesting administration of ground water in the Big Wood Ground Water Management Area since 2014.