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**STATE OF IDAHO**

**DEPARTMENT OF WATER RESOURCES**

IN THE MATTER OF THE DISTRIBUTION  
OF WATER TO VARIOUS WATER RIGHTS  
HELD BY AND FOR THE BENEFIT OF  
A&B IRRIGATION DISTRICT, AMERICAN  
FALLS RESERVOIR DISTRICT #2,  
BURLEY IRRIGATION DISTRICT, MILNER  
IRRIGATION DISTRICT, MINIDOKA  
IRRIGATION DISTRICT, NORTH SIDE  
CANAL COMPANY, AND TWIN FALLS  
CANAL COMPANY

Docket No. CM-DC-2010-001

**Declaration of Jaxon Higgs**

I, Jaxon Higgs, declare the following:

1. I am over the age of 18 and competent to testify. If called upon to testify, I could testify to the following, all of which are within my own personal knowledge or based upon my professional judgment.

2. I am a licensed professional Geologist in the State of Idaho. I have a bachelor’s degree in Geology from Brigham Young University Idaho and a master’s degree in Hydrology from the University of Idaho.

3. I am the principal owner and operator of Water Well Consultants (“WWC”), an Idaho corporation with its principal address at 355 W. 500 S., Burley, Idaho 83318. WWC provides a variety of hydrogeologic services in southern Idaho related to aquifer management and water conservation. Contracted duties include, but are not limited to, monitoring of aquifer health, usage measurement and reporting, and management of aquifer recharge programs.

4. I am a consultant for Idaho Ground Water Appropriators, Inc. (“IGWA”). In that capacity I provide technical assistance on a variety of matters, including groundwater modelling and other issues related to the Surface Water Coalition (“SWC”) delivery call.

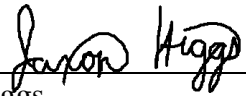
5. From November 16 to December 21, 2022, I participated in several Technical Working Group meetings with the Idaho Department of Water Resources (“Department”) staff via virtual meetings, to review the *Fourth Amended Final Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover* (“Fourth Methodology Order”) and the Department staff’s findings. The information covered during these Technical Working Group meetings was complex and voluminous.

6. I have reviewed and consulted with IGWA concerning the *Fifth Amended Final Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover* (“Fifth Methodology Order”) issued by the Director on April 21, 2023, and will be involved in reviewing the Fifth Methodology Order, analyzing data, and preparing expert reports.

7. My family has a long-standing road trip vacation to Mexico planned for May 27- June 10, 2023. Therefore, I am unable to participate in the hearing currently scheduled for June 6-10, 2023.


I declare under the penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

DATED this 4<sup>th</sup> day of May, 2023.

By:  \_\_\_\_\_  
Jaxon Higgs

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of May, 2023, I served the foregoing document on the persons below via email or as otherwise indicated:

  
Thomas J. Budge

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