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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

**GROUND WATER DISTRICTS'
I.R.C.P. 30(b)(6) NOTICE
OF TAKING DEPOSITION
DUCES TECUM OF TWIN FALLS
CANAL COMPANY**

To: Twin Falls Canal Company and its counsel of record:

PLEASE TAKE NOTICE that counsel for Idaho Ground Water Appropriators, Inc., Bingham Ground Water District, and Bonneville-Jefferson Ground Water District will join in taking the deposition of Twin Falls Canal Company ("TFCC") as set forth in the *Cities' I.R.C.P. 30(b)(6) Notice of Taking Deposition Ducus Tecum of Twin Falls Canal Company* served May 19, 2023, in this matter. Please provide to said counsel via email by 12:00 p.m. May 24, 2023, copies of all documents requested in the Cities' deposition notice. In addition to documents responsive to Cities' deposition notice, please provide the following:


- A. A map, image, schematic, diagram, survey, or other such illustrative document of TFCC’s water storage and delivery system;
- B. Copies of any document reporting or cataloging TFCC’s spill sites and the measurements relating to TFCC’s spill sites;
- C. An Idaho Department of Water Resources (“IDWR”) water report and map for each water right owned by TFCC;
- D. An IDWR water report and map for each water right delivered through TFCC’s water storage and delivery system that is not owned by TFCC;
- E. Copies of TFCC’s bylaws and any other company governing guidelines, rules, articles, or documents;
- F. Copies of all water delivery agreements, wheeling agreements, and other agreements by which TFCC delivers water under water rights not owned by TFCC;
- G. A copy of the 2006 Settlement Agreement among the canal companies;
- H. Copies of all letters, agreements, memoranda, and other documents between TFCC and Idaho Power Company, or any other power company, relating directly or indirectly to the delivery of water through TFCC’s water storage and delivery system, the discharge of water from TFCC’s water storage and delivery system, or the generation of hydropower using TFCC’s water storage and delivery system.


For the purposes of this notice, the term “document” is the same as that described in the Cities’ deposition notice.

DATED this 23rd day of May, 2023.


RACINE OLSON, PLLP

OLSEN & TAGGART PLLC

By: 
 Thomas J. Budge
 Attorneys for IGWA


By: 
 Signed for: Skyler C. Johns
 Attorneys for Bonneville-Jefferson
 Ground Water District

DYLAN ANDERSON LAW

By: 
 Signed for: Dylan Anderson
 Attorney for Bingham Ground Water District

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May, 2023, I served the foregoing document on the persons below via email or as otherwise indicated:



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