

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

IN THE MATTER OF DISTRIBUTION OF WATER TO  
VARIOUS WATER RIGHTS HELD BY OR FOR THE  
BENEFIT OF A&B 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

**ORDER REVISING JULY  
2025 FORECAST SUPPLY**

**(METHODOLOGY STEPS 7–8)**

The Director of the Idaho Department of Water Resources (“Department”) finds, concludes, and orders as follows:

**FINDINGS OF FACT**

**A. Background**

1. On July 19, 2023, the Director issued the *Sixth Final Order Regarding Methodology for Determining Material Injury to Reasonable In-Season Demand and Reasonable Carryover* (“*Methodology Order*”). The *Methodology Order* established nine steps for determining material injury to members of the Surface Water Coalition (“SWC”). This order applies Steps 7 and 8 of the *Methodology Order*.

2. On April 16, 2025, the Director issued the *Final Order Regarding April 2025 Forecast Supply (Methodology Steps 1–3)* (“*April Forecast Supply Order*”). The *April Forecast Supply Order* predicted a demand shortfall to the SWC of 63,000 acre-feet for the 2025 irrigation season. *April Forecast Supply Order* at 3. At that time, the only member of the SWC predicted to experience material injury during the 2025 irrigation season was Twin Falls Canal Company (“TFCC”). The Director ordered that, by May 1, 2025, ground water users with consumptive water rights “junior to August 28, 1955, within the Eastern Snake Plain Aquifer area of common ground water supply shall establish, to the satisfaction of the Director, that they can mitigate for their proportionate share of the predicted April IDS [(in-season demand shortfall)] of 63,000 acre-feet in accordance with an approved mitigation plan.” *Id.* at 6. The Director also ordered that, “[i]f a junior ground water user cannot establish . . . that they can mitigate for their proportionate share of the predicted April IDS in accordance with an approved mitigation plan, the Director will issue an order curtailing the junior-priority ground water user.” *Id.*

3. On May 16, 2025, the Director issued a *Final Order Curtailing Ground Water Rights Junior to August 28, 1955* (“*First Curtailment Order*”). The Director ordered that:

[E]ffective May 31, 2025, ground water users holding water rights bearing priority dates junior to August 28, 1955, within the ESPA ACGWS, and listed in Attachment A to this order, shall curtail/refrain from diversion and use of ground

water pursuant to those water rights unless notified by the Department that the order of curtailment has been modified or rescinded as to their water rights.

*First Curtailment Order* at 4.

4. On July 10, 2025, the Director issued the *Order Revising April 2025 Forecast Supply and Continuing May 16, 2025 Curtailment Order (Methodology Steps 5 & 6)* (“*July Forecast Supply Order*”), revising the IDS to 75,300 acre-feet. *July Forecast Supply Order* at 8. The Director ordered that:

On or before July 24, 2025, ground water users holding consumptive water rights bearing priority dates junior to October 11, 1900, within the Eastern Snake Plain Aquifer area of common ground water supply shall establish, to the satisfaction of the Director, that they can mitigate for their proportionate share of the predicted IDS of 75,300 acre-feet in accordance with an approved mitigation plan. If a junior ground water user cannot establish, to the satisfaction of the Director, that they can mitigate for their proportionate share of the predicted IDS of 75,300 acre-feet in accordance with an approved mitigation plan, the Director will issue an order curtailing the junior-priority ground water user.

*Id.* at 12 (footnote omitted).

5. Step 7 of the *Methodology Order* requires:

Shortly before the estimated Time of Need, but following the events described in Steps 5 and 6, the Director will, for each member of the SWC: (1) recalculate RISD [(reasonable in-season demand)]; (2) issue a revised FS [(forecast supply)]; and (3) establish the Time of Need. The revised FS for each SWC entity is the sum of the year-to-date actual natural flow diversions, the forecasted natural flow supply for the remainder of the season, and the storage allocation for each member of the SWC. The forecasted natural flow supply for the remainder of the season will be based on analogous year(s) with similar Blackfoot to Milner reach gains. The storage allocation will be based on the actual preliminary storage allocations issued by the BOR [(United States Bureau of Reclamation)] and Water District 01.

This information will be used to recalculate RISD and adjust the projected IDS for each member of the SWC. RISD will be calculated utilizing the project efficiency, BD [(baseline year demand)], and the cumulative actual CWN [(crop water need)] determined up to that point in the irrigation season. The Director will then issue revised RISD and IDS values.

A transient ESPAM simulation will be run to determine the priority date of water rights that must be curtailed to produce the demand shortfall volume by September 30 of the same year. Curtailment will be simulated within the area of common ground water supply, as described by CM Rule 50.01.

*Methodology Order* at 44.

6. Effective July 1, 2024, Senate Bill 1341 added a new section to Idaho Code, Idaho Code § 42-233c, which codified the description of the ESPA area of common ground water supply. S.B. 1341, 67th Leg., 2d Reg. Sess. (Idaho 2024). The current area of common ground water supply for the Eastern Snake Plain Aquifer is defined as the aquifer underlying the Eastern Snake River Plain as described in the model calibration report for ESPAM2.2, dated May 2021. I.C. § 42-233c(1).

7. Step 8 of the *Methodology Order* requires:

At the Time of Need, junior ground water users are required to deliver to each injured member of the SWC the Step 7 revised IDS calculated at the Time of Need. Alternatively, any additional mitigation obligation calculated in Step 6 and Step 7 can be satisfied from each SWC member's reasonable carryover if (a) the reasonable carryover exceeds the additional mitigation obligation, and (b) the junior ground water users secure sufficient water to replace the reasonable carryover pursuant to an approved mitigation plan.

The Director will review, at the end of the season, the volume and efficiencies of application of surface water, the amount of mitigation water delivered by junior ground water users, and may, in the exercise of his professional judgment, readjust the reasonable carryover shortfalls to reflect these considerations.

*Methodology Order* at 44–45.

## **B. Climate**

8. The April 2025 Joint Forecast prepared by the United States Army Corps of Engineers and the United States Bureau of Reclamation (“BOR”) predicted 3,380,000 acre-feet of natural flow at the Heise gage for the period April–July 2025. *April Forecast Supply Order* at 2. The Joint Forecast “is generally as accurate a forecast as is possible using current data gathering and forecasting techniques.” *Methodology Order* at 19.

9. The April through July precipitation was below average, while the April through July temperature was above average.<sup>1</sup> The National Weather Service's Twin Falls weather station reported 9%, 38%, 0%, and 68% of normal precipitation in April, May, June, and July, respectively. Twin Falls temperatures were 2.5, 3.8, 3.4, and 2.2 degrees above normal for April, May, June, and July, respectively. According to data measured at the Natural Resources Conservation Service's SNOTEL sites in the Upper Snake River Basin, the basin received 73%, 74%, 19%, and 66% of average precipitation in April, May, June, and July, respectively.<sup>2</sup>

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<sup>1</sup> Precipitation and temperature data obtained from the NOAA National Weather Service Preliminary Monthly Climate Data for the Twin Falls weather station (Twin Falls Airport).

<sup>2</sup> Natural Resources Conservation Service's (NRCS) SNOTEL precipitation in the Upper Snake River Basin has been updated by the NRCS since the *Order Revising April 2025 Forecast Supply and Continuing May 16, 2025 Curtailment Order* was issued.

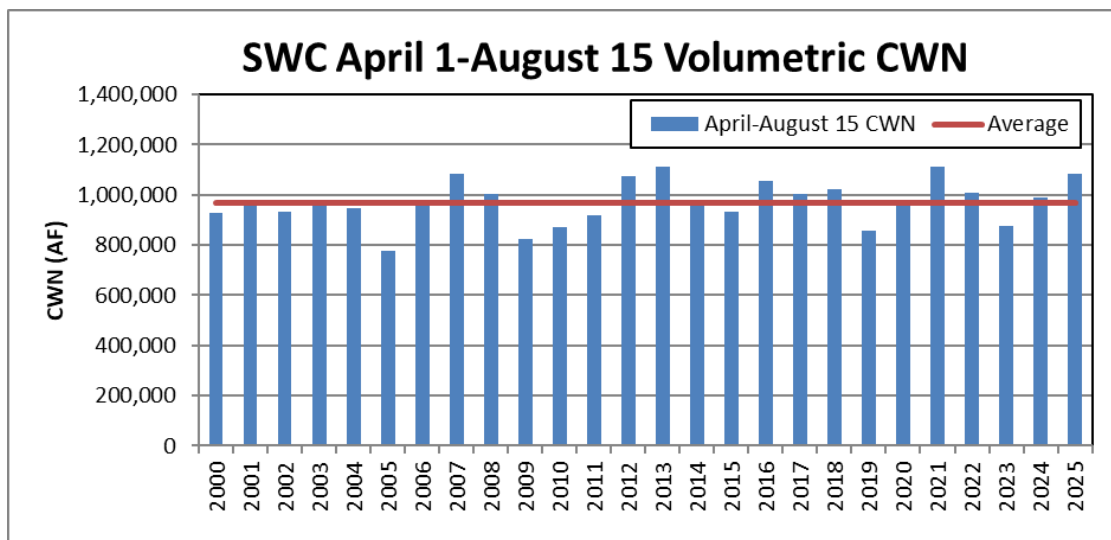
### C. Reasonable In-Season Demand

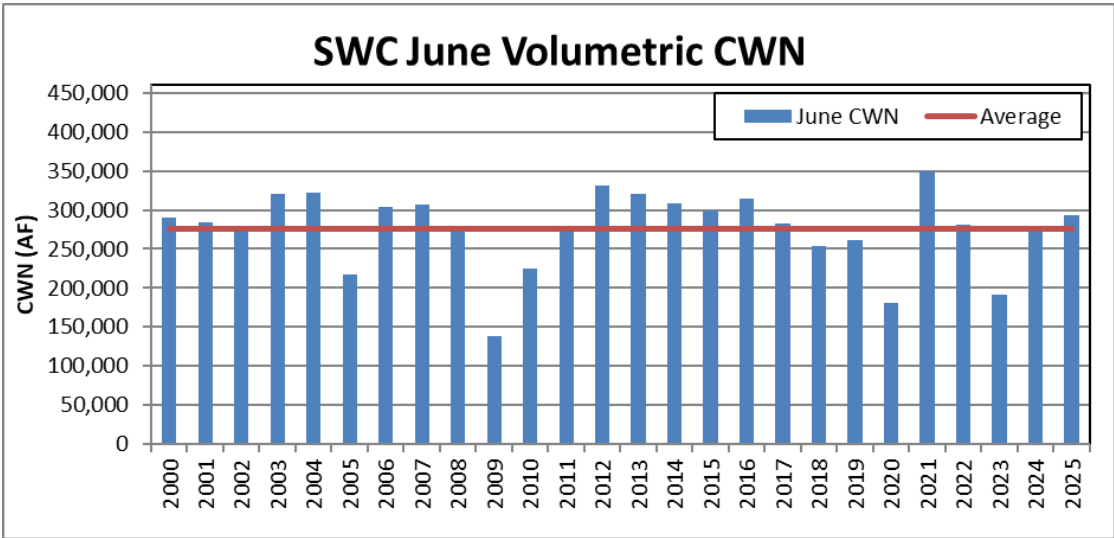
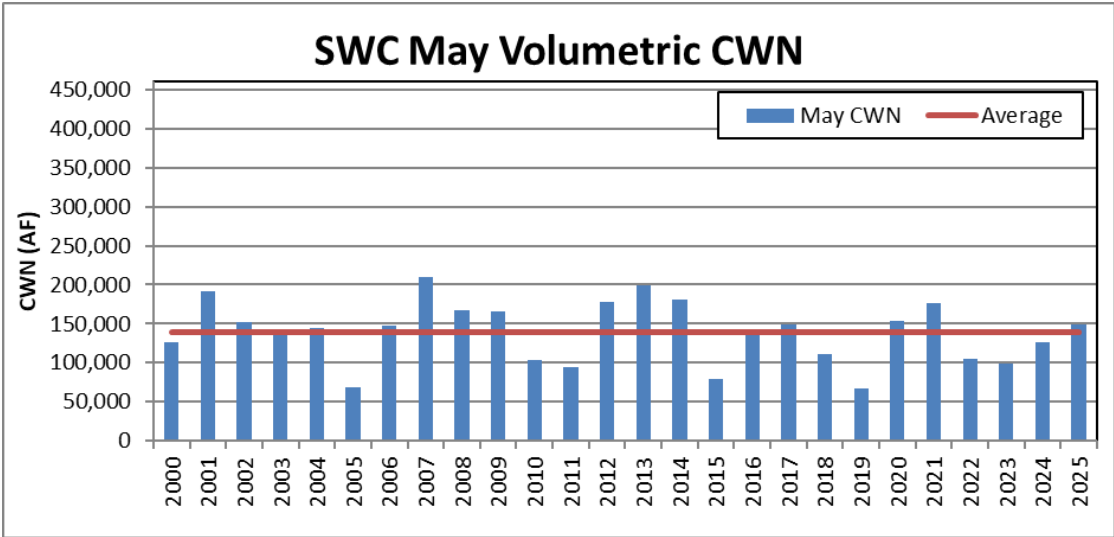
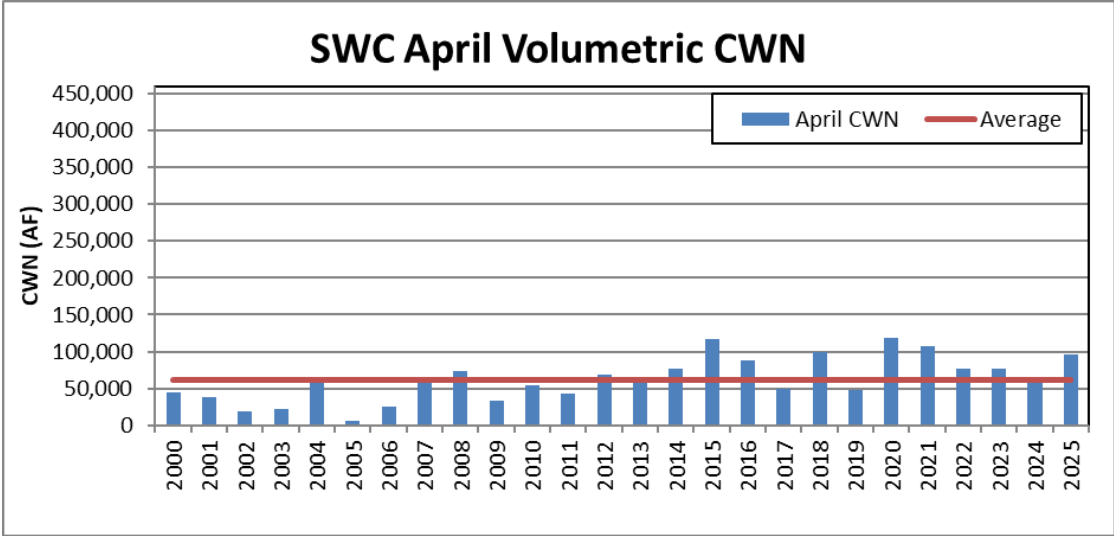
10. RISD is the volume of water that would be required to be diverted at the point of diversion during the year of evaluation to grow the specific crops within the service area of the entity. In April, the demand from the 2018 baseline year (BLY) represents the RISD. During the irrigation season, the RISD for the already expired portion of the irrigation season is recalculated by dividing the actual crop water need (CWN) for each entity by the project efficiency for that entity. For the future remainder of the irrigation season, the RISD is the demand predicted from the 2018 BLY. RISD is calculated on a monthly timestep.

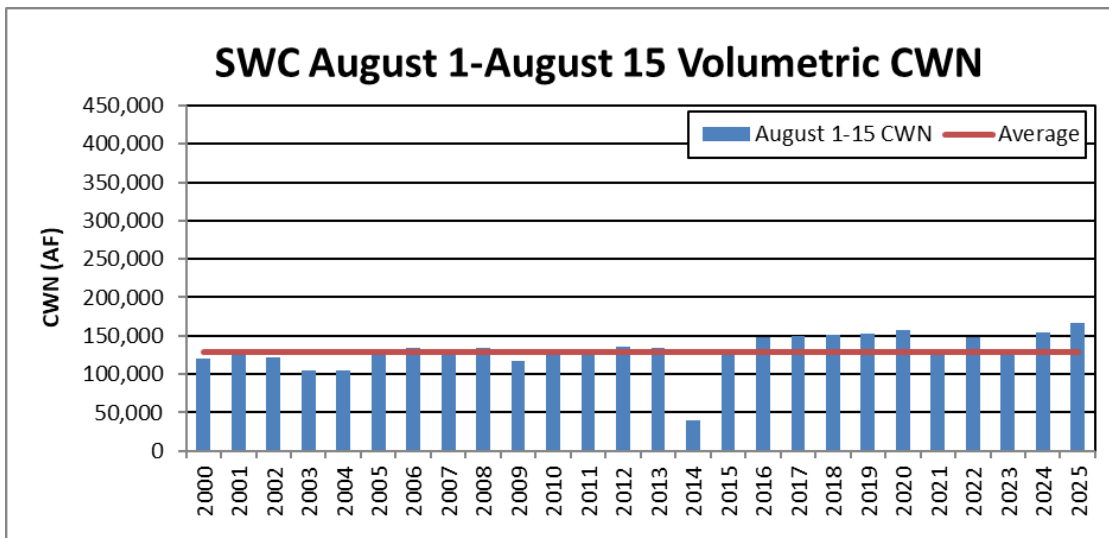
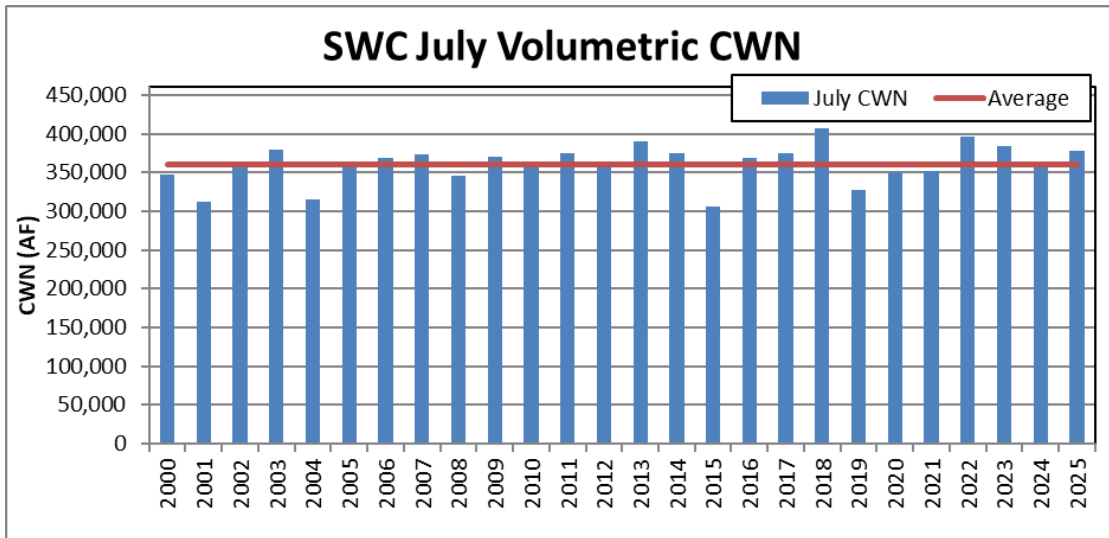
#### i. Crop Water Need

11. CWN is the project wide volume of irrigation water required for crop growth so crop development is not limited by water availability. CWN is the difference between the fully realized consumptive use associated with crop development, or evapotranspiration, and effective precipitation. CWN is an input variable for calculating RISD for those months of the irrigation season that are complete. Actual RISD for the completed portion of the irrigation season is combined with monthly predicted baseline demands for the remaining months of the irrigation season to calculate a season-total RISD volume. Demand shortfall is then calculated as the difference between the adjusted forecast supply and the RISD. For specifics regarding determination of CWN, see page 15 of the *Methodology Order*.

12. As calculated from the beginning of the irrigation season (April 1), the SWC's volumetric CWN for the current water year through August 15 is 1,083,069 acre-feet. This volume is 110% of the April 1 through August 15 ten-year average CWN (2015-2024) and 106% of the CWN for the (2018) BLY. As calculated from April 1 through August 15, from the year 2000 to now, 2025 has the fourth largest CWN volume of any irrigation season. The following graphs summarize monthly volumetric CWN values.







ii. *Extension of BLY*

13. The RISD for the future portion of the irrigation season is the August 16–October 31 demand for (2018) BLY. The numeric August 16–October 31 demand values are shown in the table in Finding of Fact 14 below.

iii. *Calculation of RISD*

14. As calculated from the beginning of the irrigation season (April 1), the SWC’s volumetric RISD for 2025 through August 15 is 2,537,439 acre-feet. This volume is 112% of the April 1–August 15 ten-year average RISD (2015-2024) and 105% of the April 1–August 15 demand for the (2018) BLY. As calculated from April 1 to August 15, from the year 2000 until this year, 2025 has the fifth largest RISD volume of any irrigation season. The recalculated RISD on August 15 of the 2025 irrigation season by entity is summarized in column six of the following table:

	April 1– August 15 CWN (AF)	Range of April 1– August 15 Monthly Project Efficiencies	April 1– August 15 RISD (AF)	August 16– October 31 Demand for 2018 BLY (AF)	Recalculated RISD (AF)
A&B	29,276	0.41-0.92	47,932	16,216	64,148
AFRD2	121,490	0.20-0.44	339,309	138,946	478,255
BID	88,126	0.30-0.52	201,896	63,932	265,828
Milner	25,828	0.36-0.68	45,207	16,031	61,238
Minidoka	159,119	0.36-0.65	307,036	86,518	393,554
NSCC	281,341	0.21-0.48	752,214	276,703	1,028,917
TFCC	377,888	0.27-0.59	843,845	330,074	1,173,919

**D. Forecast Supply**

15. When determined during the irrigation season, the forecast supply (FS) is the sum of the year-to-date actual natural flow diversions, the forecasted natural flow supply for the remainder of the season, and storage allocations for each member of the SWC. *Methodology Order* at 43. Actual natural flow diversions for the already expired portion of the irrigation season are extracted from the Department’s water rights accounting program. The forecasted natural flow supply for the remainder of the irrigation season is based on the selection of an analogue year with similar Blackfoot to Milner reach gains. *Id.* at 44. Storage allocations are established by the BOR and Water District 01 (“WD1”) after the day of allocation. *Id.*

i. *Sum of Actual Natural Flow Diverted*

16. Actual natural flow diverted for the period April 1 through August 15 for each SWC member are summarized in the table contained within the Summary of Forecast Supply section in Finding of Fact 21.

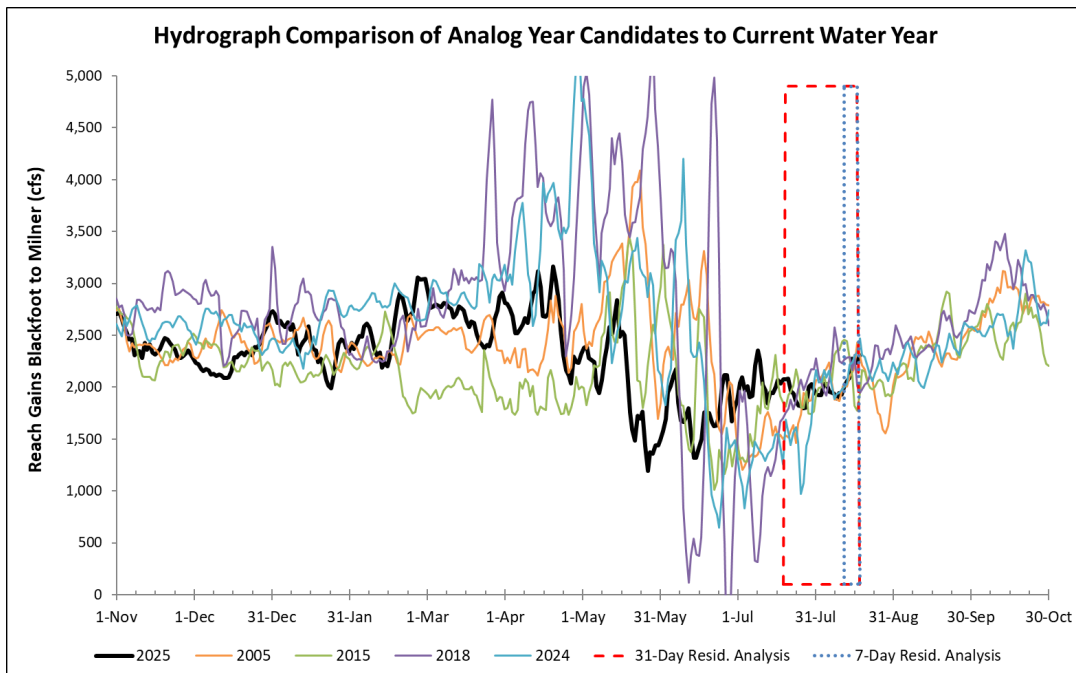
ii. *Selection of an Analogous Year to Predict Remaining Natural Flow*

17. Natural flow diversions for the remainder of the irrigation season were predicted by choosing an analogue year. The Department used a residual analysis<sup>3</sup> completed on a daily time step to compare the reach gains from July 19 to August 18 for the current water year to historical reach gains for the same period for the 1991–2024 water years. Based on its residual analysis and a qualitative review, the Department selected four candidate years: 2005, 2015, 2018, and 2024. These years represent the four years with the most similar reach gains (i.e., the lowest average residual value over a specified range) over the analysis period and the residuals are summarized in the following table:

**Summary of Residual Analysis of Candidate Years**

Time Period	2005	2015	2018	2024
7-Day (8/12 – 8/18)	0.2%	1.9%	-0.7%	-2.4%
31-Day (7/19 – 8/18)	3.3%	-2.3%	-4.9%	7.9%

18. The following hydrograph compares the current water year to the four candidate years with the most similar reach gains as determined by the residual analysis and qualitative review. The Department examined natural flow diversions for each of the candidate years and selected 2005 as the analogue year used to predict natural flow diversions for the remainder of the irrigation season. The Department chose 2005 because the residual analysis and qualitative review demonstrated 2005 was most like 2025 conditions when considering the reach gains for the most recent 7-day and 31-day periods.



<sup>3</sup> The daily residual is expressed as a percentage and defined as the difference between the current water year reach gain (CY) and the historical reach gain (HY) divided by the current water year reach gain:  $R = (CY - HY)/CY$ .

iii. *Storage Allocations*

19. Preliminary storage allocation values for each member of the SWC were established by the BOR and WD1 and published in WD1’s preliminary Storage Report on July 15, 2025.<sup>4</sup> Storage allocation values for each SWC member are summarized in the table in Finding of Fact 21 below.

iv. *Adjustments to Total Supply*

20. The natural flow and storage water supplies were both adjusted as shown in the table in Finding of Fact 21 below. Adjustments to natural flow include water delivered to Southwest Irrigation District by BID and Milner, 691 acre-feet and 560 acre-feet, respectively . Adjustments to natural flow also include 1,441 acre-feet and 400 acre-feet of recharge water, delivered by the AFRD2 and BID, respectively, for the Idaho Water Resource Board. The only adjustments made to the stored water supply were for the Minidoka Return Flow Credit.<sup>5</sup> The Department did not adjust SWC water supplies for wheeled storage water published in WD1’s weekly reports because wheeled water does not increase the amount of water available for use by the SWC. The Department did not adjust SWC water supplies to account for water supplied to or from the rental pool because these transactions artificially increase or decrease the shortfall obligation.

v. *Summary of Forecast Supply*

21. The table below contains the individual components of the FS for each of the SWC members.

	April 1– August 15 Natural Flow Diverted (AF)	August 16– October 31 Predicted Natural Diversions Flow (AF)	Natural Flow Adjustment (AF)	Preliminary Storage Allocation (AF)	Minidoka Credit Adjustment (AF)	Forecast Supply (AF)
A&B	9,547	0	0	120,473	0	130,020
AFRD2	90,640	0	(1,441)	383,912	1,000	474,111
BID	123,935	8,282	(1,091)	214,990	5,130	351,246
Milner	14,114	305	(560)	80,506	0	94,365
Minidoka	156,842	10,480	0	338,930	8,370	514,622
NSCC	385,639	54,218	0	798,776	(7,750)	1,230,883
TFCC	626,598	261,530	0	232,941	(6,750)	1,114,319

<sup>4</sup> The preliminary Storage Report may be viewed at: <https://www.waterdistrict1.com/media/yxefjahy/2025-07-15-preliminary-storage-report.pdf>.

<sup>5</sup> For an explanation of the Minidoka Credit, see pages 126-127 of *Concepts, Practices, and Procedures Used to Distribute Water Within Water District #1*, which can be found at: <https://www.waterdistrict1.com/media/uabos05r/wd01-procedures-manual-4-12-2023.pdf>

**E. Revised Shortfall Prediction**

22. Demand Shortfall is calculated as the difference between RISD and the FS.

23. Based on the methods described above, and as summarized in the following table, the Director predicts, at this time, that AFRD2 and TFCC will be materially injured by junior ground water pumping.

	Forecast Supply (AF)	RISD (AF)	Shortfall (AF)
A&B	130,020	64,148	0
AFRD2	474,111	478,255	4,100
BID	351,246	265,828	0
Milner	94,365	61,238	0
Minidoka	514,622	393,554	0
NSCC	1,230,883	1,028,917	0
TFCC	1,114,319	1,173,919	59,600
		Total	63,700

24. The current, predicted shortfall to the SWC’s RISD is 63,700 acre-feet.

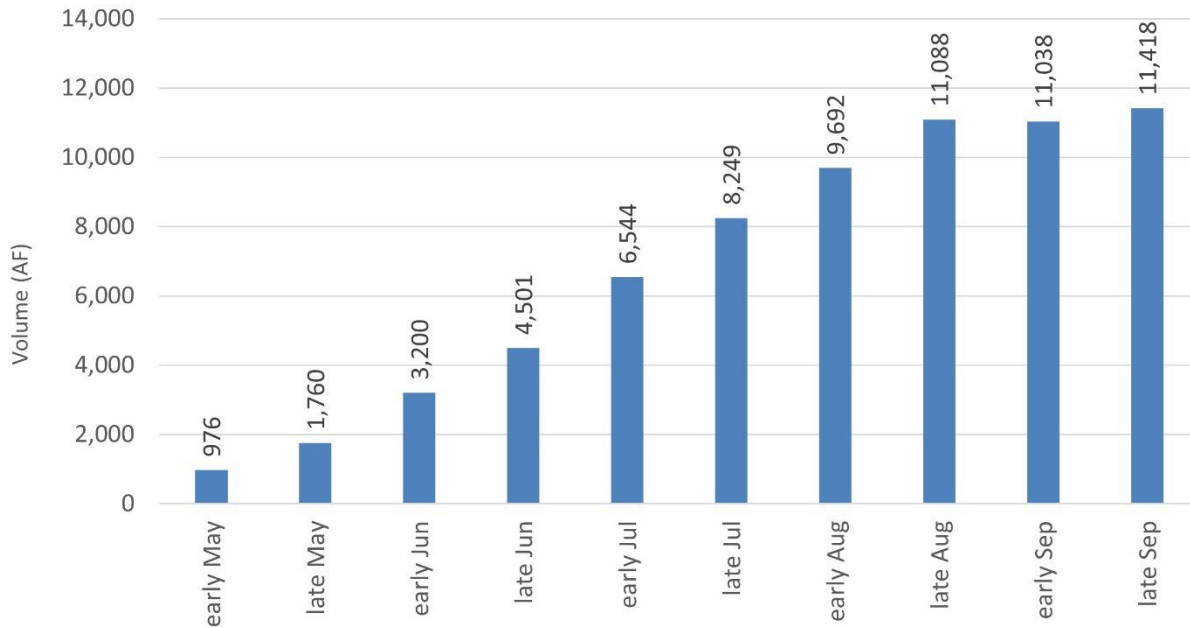
**F. Time of Need**

25. The Department established the Time of Need by predicting when the remaining storage balance for TFCC was equal to their reasonable carryover volume of 37,400 acre-feet and the remaining storage balance for AFRD2 was equal to their reasonable carryover volume of 16,700 acre-feet. As described above, the Department selected 2005 as the analogue year it used to predict the storage use for TFCC and AFRD2 for the remainder of this season. Anticipating that TFCC’s and AFRD2’s storage use for the remainder of the 2025 season will be similar to their storage use in 2005, TFCC’s Time of Need occurred on August 16, 2025, and AFRD2’s Time of Need will occur on September 28, 2025.

**G. Priority and Curtailment**

26. In April 2025, pursuant to the *Methodology Order*, the Department ran the Eastern Snake Plain Aquifer Model version 2.2 (“ESPAM2.2”) to calculate the priority curtailment date, such that the curtailment of all water rights junior to the date within the area of common ground water supply, would produce a volume of water equal to the April IDS in the Snake River between May 1 and September 30. The ESPAM2.2 simulation predicted curtailment of ground water rights bearing priority dates junior to August 28, 1955, would produce the volume of water equal to the predicted April IDS of 63,000 AF in the near Blackfoot to Minidoka reach. *April Forecast Supply Order*, at 4.

27. In the *July Forecast Supply Order*, the Director predicted a demand shortfall to the SWC of 75,300 acre-feet. In July 2025, the Department ran the ESPAM2.2 to simulate the effect of adjusting the curtailment priority date at the end of July. The ESPAM2.2 simulation calculated that the curtailment of ground water rights junior to August 28, 1955, through the end of July followed by curtailment of groundwater rights junior to October 11, 1900,<sup>6</sup> would produce a volume of water of 58,000 AF in the near Blackfoot to Minidoka reach between July 1 and September 30 of this irrigation season. The following figure summarizes the results of the ESPAM2.2 simulation:



Modeled increase in ESPA discharge to near Blackfoot to Minidoka reach resulting from curtailment of ground water junior to August 28, 1955, May-July, and junior to October 11, 1900, beginning at end of July

28. The ESPAM2.2 simulation calculated that the curtailment of ground water rights junior to August 28, 1955, through the end of July followed by curtailment of groundwater rights junior to October 11, 1900, will produce a volume of water of 33,500 AF in the near Blackfoot to Minidoka reach between August 16 and September 30 of this irrigation season.

29. The predicted mid-August through September benefits to the near Blackfoot to Minidoka reach from curtailment of ground water rights bearing priority dates junior to August 28, 1955, through the end of July followed by curtailment of groundwater rights junior to October 11, 1900, are less than the August IDS of 63,700 acre-feet. Continuing the curtailment of ground water rights junior to October 11, 1900, will offset as much of the August IDS as possible.

<sup>6</sup> October 11, 1900, is the priority date equal to TFCC’s Water Right No. 1-209, the most senior SWC natural flow water right predicted to be injured.

## CONCLUSIONS OF LAW

1. Based on Findings of Fact 8 through 29 above, TFCC and AFRD2 are being materially injured. The updated predicted IDS is 63,700 acre-feet. The predicted shortfall to TFCC is 59,400 acre-feet. The predicted shortfall to AFRD2 is 4,100 acre-feet.
2. Based on current information, the Time of Need for TFCC occurred on August 16, 2025, and the Time of Need for AFRD2 will occur on September 28, 2025.
3. Pursuant to Step 8, at the Time of Need, junior ground water users are required to deliver to each injured member of the SWC the Step 7 revised IDS calculated at the Time of Need. Alternatively, any additional mitigation obligation calculated in Step 6 and Step 7 can be satisfied from each SWC member's reasonable carryover if (a) the reasonable carryover exceeds the additional mitigation obligation, and (b) the junior ground water users secure sufficient water to replace the reasonable carryover pursuant to an approved mitigation plan.
4. Using the ESPAM2.2, the Department has determined that the curtailment of ground water rights bearing priority dates junior to August 28, 1955, through the end of July followed by curtailment of groundwater rights junior to October 11, 1900, would result in a volume of water less than the predicted IDS of 63,700 acre-feet in the near Blackfoot to Minidoka reach between August 16 and September 30 of this irrigation season. Accordingly, continuing the curtailment to include ground water rights junior to October 11, 1900, is necessary for curtailment to offset as much of the IDS as possible.
5. Junior ground water users holding consumptive water rights bearing priority dates junior to October 11, 1900, within the Eastern Snake Plain Aquifer area of common ground water supply must mitigate for their proportionate share of the predicted July IDS in accordance with an approved mitigation plan.<sup>7</sup> For the 2025 irrigation season, there are no junior ground water users mitigating for their proportionate share of the predicted July IDS with a secured volume of water. Accordingly, no junior ground water users are required to deliver to each injured member of the SWC the Step 7 revised IDS calculated at the Time of Need.

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<sup>7</sup> There are five approved mitigation plans responding to the SWC delivery call, the SWC stipulates to each: (1) No. CM-MP-2015-003 for the benefit of A&B; (2) No. CM-MP-2010-001 for the benefit of Southwest Irrigation District and Goose Creek Irrigation District (collectively, "SWID"); (3) No. CM-MP-2024-003 for the benefit of the Ground Water Districts; (4) No. CM-MP-2019-001 for the benefit of the Coalition of Cities; and (5) No. CM-MP-2007-001 for the benefit of the Water Mitigation Coalition. Given the nature of A&B's mitigation plan, the Department normally calculates A&B's proportionate share of the predicted IDS. However, A&B and the SWC entered into a stipulation to define A&B's mitigation obligation for the 2025 irrigation season. In the stipulation, A&B agreed to continue its ground water conversions projects and assign and deliver 1,252 acre-feet of storage water to TFCC. The Director has confirmed that 1,252 acre-feet of storage water has been assigned to A&B. Because the SWC agreed that the above actions satisfy A&B's obligation to the SWC for the 2025 irrigation season, A&B does not need to establish that they can mitigate for its proportionate share of the predicted IDS. Due to the nature of the mitigation plans for SWID, the Ground Water Districts, the Coalition of Cities, and the Water Mitigation Coalition, these entities do not need to establish that they can mitigate for their proportionate share of the predicted IDS.

## ORDER

Based upon and consistent with the foregoing, IT IS HEREBY ORDERED the Director's revised in-season prediction is an in-season demand shortfall of 63,700 acre-feet.

IT IS FURTHER ORDERED that the July 25, 2025 *Curtailment Order* remains in full force and effect. All ground water users holding water rights listed in Attachment A to the July 25, 2025 *Curtailment Order* bearing priority dates junior to October 11, 1900, shall continue to be curtailed from diversion and use of ground water pursuant to those water rights unless they are mitigating in accordance with an approved mitigation plan or are notified by the Department that the order of curtailment has been modified or rescinded as to their water rights.

Dated this 11th day of September 2025.



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MATHEW WEAVER  
Director

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of September 2025, a true and correct copy of the foregoing was served by the method indicated below, and addressed to the following:

<p>John K. Simpson  MARTEN LAW LLP  PO Box 2139  Boise, ID 83701-2139  <a href="mailto:jsimpson@martenlaw.com">jsimpson@martenlaw.com</a>  <a href="mailto:*jks@idahowaters.com">*jks@idahowaters.com</a></p>	<p><input checked="" type="checkbox"/> U.S. Mail, postage prepaid  <input checked="" type="checkbox"/> Email</p>
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Sarah Tschohl  
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**EXPLANATORY INFORMATION TO ACCOMPANY A  
FINAL ORDER**

(To be used in connection with actions when a hearing was **not** held)

The accompanying document is a "Final Order" issued by the Idaho Department of Water Resources ("Department") pursuant to Idaho Code § 67-5246.

**PETITION FOR RECONSIDERATION**

(See Idaho Code § 67-5246(4))

Any party may file a petition for reconsideration of this final order within fourteen (14) days of the service date of this order as shown on the certificate of service. **Note: the petition must be received by the Department within this fourteen (14) day period.** The presiding officer will act on a petition for reconsideration within twenty-one (21) days of its receipt, or the petition will be considered denied by operation of law.

**REQUEST FOR HEARING**

(See Idaho Code § 42-1701A(3))

Unless the right to a hearing before the Department or the Water Resource Board is otherwise provided by statute, any person aggrieved by any final decision, determination, order or action of the Director, and who has not previously been afforded an opportunity for a hearing on the matter may request a hearing pursuant to Idaho Code § 42-1701A(3). A written petition to the Director contesting this final order and requesting a hearing must be filed with the Department by any aggrieved person **within fifteen (15) days after service of this final order.**

**CERTIFICATE OF SERVICE**

(See IDAPA 37.01.01.053, 37.01.01.202)

All documents filed with the Department in connection with a petition for reconsideration or a request for hearing of this final order shall be served on all other parties to the proceedings in accordance with Rules of Procedure 53 and 202.