

Robyn M. Brody (ISB No. 5678)
Brody Law Office, PLLC
P.O. Box 554
Rupert, ID 83350
Telephone: (208) 434-2778
Facsimile: (208) 434-2780
robynbrody@hotmail.com

J. Justin May (ISB No. 5818)
May, Browning & May, PLLC
1419 W. Washington
Boise, Idaho 83702
Telephone: (208) 429-0905
Facsimile: (208) 342-7278
jmay@maybrowning.com

Fritz X. Haemmerle (ISB No. 3862)
Haemmerle & Haemmerle, PLLC
P.O. Box 1800
Hailey, ID 83333
Telephone: (208) 578-0520
Facsimile: (208) 578-0564
fxh@haemlaw.com

Attorneys for Rangen, Inc.

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

**IN THE MATTER OF THE MITIGATION
PLAN FILED BY THE IDAHO GROUND
WATER APPROPRIATORS FOR THE
DISTRIBUTION OF WATER TO WATER
RIGHT NOS. 36-02551 AND 36-07694 IN
THE NAME OF RANGEN, INC.**

Docket No. CM-MP-2014-001

**RANGEN, INC.'S SECOND
AMENDED EXHIBIT LIST**

COMES NOW, Rangen, Inc. ("Rangen"), by and through its attorneys of record, and submits this Second Amended Exhibit List in accordance with the Order Authorizing Discovery entered on March 4, 2014. Rangen reserves the right to introduce any of the following exhibits at the hearing of this matter:

See Exhibit 1 attached hereto and incorporated by reference

Rangen also reserves the right to introduce any exhibits identified or produced by IGWA or the Idaho Department of Water Resources in connection with this matter. Rangen reserves the right

to supplement or amend this list as discovery in this matter is ongoing and the deposition of Dr. Charles Brendecke will not be taken until Friday, March 14, 2014.

DATED this 16 day of March, 2014.

MAY, BROWNING & MAY, PLLC

By: _____

J. Justin May

CERTIFICATE OF SERVICE

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the 16 day of March, 2014, I caused a true and correct copy of the foregoing document to be served using the method indicated upon the following:

Original: Director Gary Spackman Idaho Department of Water Resources P.O. Box 83720 Boise, ID 83720-0098 Deborah.Gibson@idwr.idaho.gov	Hand Delivery ☒ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
Garrick Baxter Idaho Department of Water Resources P.O. Box 83720 Boise, Idaho 83720-0098 garrick.baxter@idwr.idaho.gov	Hand Delivery ☒ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
Randall C. Budge Thomas J. Budge RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED P.O. Box 1391 101 South Capitol Blvd, Ste 300 Boise, ID 83704-1391 Fax: 208-433-0167 rcb@racinelaw.net tjb@racinelaw.net	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
Sarah Klahn Mitra Pemberton WHITE & JANKOWSKI Kittredge Building,	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐

511 16th Street, Suite 500 Denver, CO 80202 sarahk@white-jankowski.com mitrap@white-jankowski.com	E-Mail ☐
Dean Tranmer City of Pocatello P.O. Box 4169 Pocatello, ID 83201 dtranmer@pocatello.us	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
John K. Simpson Travis L. Thompson Paul L. Arrington Barker Rosholt & Simpson, L.L.P. 195 River Vista Place, Suite 204 Twin Falls, ID 83301-3029 Facsimile: (208) 735-2444 tlt@idahowaters.com jks@idahowaters.com	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
W. Kent Fletcher Fletcher Law Office P.O. Box 248 Burley, ID 83318 wkf@pmt.org	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒
Jerry R. Rigby Hyrum Erickson Robert H. Wood Rigby, Andrus & Rigby, Chartered 25 North Second East Rexburg, ID 83440 jrigby@rex-law.com herickson@rex-law.com rwood@rex-law.com	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☒



J. Justin May

Exhibit 1

Exhibit No.:	Bates No.:	Description:
2001		Subpoena DT Frank Erwin
2002		MCT Data from IDWR
2003		Curren Ditch Data
2004		Curren Ditch Data 1995-2013
2005		Curren Ditch Data 1995-2013
2006		WMIS Login Diversion Data
2007		Curren Irrigation Diversions Email
2008		Yenter Lemmon Email 120606
2009		Frank Erwin's Notebook
2010		Frank Erwin's Notebook
2011		Hagerman Water Features Map
2012		Water Rights Summary Billingsley Creek
2013		Subpoena DT IGWA Carlquist
2014		Mitigation Plan Blue Lakes Delivery Call
2015A		IGWA's Mitigation Plan for Dry Ups and Conversions
2015B		Mitigation Plan Snake River Farms Delivery Call
2016		Replacement Water Plan Over-the-Rim Snake River Farms Delivery Call
2017		Sandy Pipeline Documents
2018		Morris NSGWD Agreement 2014
2019		2004 ESPA Mitigation Recovery and Restoration Agreement
2020		Mitigation Plan Rangen Delivery Call
2021		Application for Water Permit No. 36-17011 (waste water)
2022		Benefit of Voluntary Curtailment and Dry Ups
2023		Subpoena DT North Side Canal Company
2024		Sandy NSCC Agreement
2025		NSGWD's Stock Share Certificate
2026		Partial Decree re NSCC Boundaries
2027		W26 Data NSCC
2028		W26 Data NSCC Contd
2029		WD Mountain and Valley Properties to NSGWD
2030		Water Deed Tanner to NSGWD
2031		Subpoena DT to Butch Morris
2032		Morris NSGWD Agreement 2014

2033	Morris NSGWD Agreement 2014
2034	Letter from NSCC to Morris 940321
2035	Aerial Photo Showing Musser Morris Rangen
2036	Aerial Photo Showing Sandy Pipeline
2037	Morris Power Usage Method Application
2038	Morris Water Reporting Data
2039	Easement Morris and NSGWD
2040	Morris Letter to Higginson re: Sandy Pipeline Usage
2041	Morris Water Right License No. 36-08723
2042	Final Order Re: Rangen Delivery Call
2043	Order on Reconsideration Re: Rangen Delivery Call
2044	Order on Reconsideration Explanatory Info Insert Re: Rangen Delivery Call
2045	MCT Measurements
2045A	Email Re: MCT Measurements
2046	Order Re: Snake River Farms Mitigation Plan
2047	Order Re: Snake River Farms Over-the-Rim Mitigation Plan
2048	2011_2013 IDWR MitigationBenefits Curren
2048A	Emails Re: Mitigation Activity Spreadsheet and Data
2048B	IDWR FTP Site Uploads for Mitigation Benefits Spreadsheet
2049	Curren Tunnel Irrigation Rights WMIS
2050	Supreme Court Decision Re: SWC Delivery Call December 2013
2051	Rangen's Protest of IGWA's Water Right Application
2052	IGWA's Responses to Rangen's First Set of Discovery
2053A	Candy 36-134A Partial Decree
2053B	Candy 36-134A Adjudication File
2054A	Rangen 36-134B Partial Decree
2054B	Rangen 36-134B Adjudication File
2055A	Morris 36-134D Partial Decree
2055B	Morris 36-134D Backfile
2055C	Morris 36-134D Adjudication File
2056A	Morris 36-134E Partial Decree
2056B	Morris 36-134E Adjudication File
2057	Musser 36-102 Partial Decree
2058A	Rangen 36-135A Partial Decree

2058B	Rangen 36-135A Adjudication File
2059A	Candy 36-135B Partial Decree
2059B	Candy 36-135B Adjudication File
2060A	Morris 36-135D Partial Decree
2060B	Morris 36-135D Adjudication File
2061A	Morris 36-135E Partial Decree
2061B	Morris 36-135E Adjudication File
2062	Morris 36-10141A Partial Decree
2063	Morris 36-10141B Partial Decree
2064A	Rangen 36-02551 Partial Decree
2064B	Rangen 36-02551 Backfile
2064C	Rangen 36-02551 Adjudication File
2065A	Rangen 36-07694 Partial Decree
2065B	Rangen 36-07694 Backfile
2066A	Rangen 36-15501 Partial Decree
2066B	Rangen 35-15501 Backfile
2067	ESPAM Simulation of 1908 Curtailment Run
2068	Rangen Water Right Application
2069	Billingsley Creek Water Rights
2070	Curren Ditch Water Rights (From Depo. Exhibit 10 - Frank Erwin's Notebooks)
2071	Transient CREP, Conversion and Recharge Model Run
2072	Frank Erwin's Non-Objection to Rangen's Water Permit
2073	Martin-Curren Tunnel 2013 Monthly Average Flow Chart and Line Graph
2074	Color Version of Exhibit 2011
2075	Extent of Morris Rights out of Martin-Curren Tunnel
	OTHER EXHIBITS NOT YET MARKED
	Transcript of Testimony at Hearing on Rangen Delivery Call