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Attorneys for Idaho Ground Water Appropriators, Inc.

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
Docket No. CM-MP-2016-001

**IGWA’s Witness and
Exhibit Disclosure**

IN THE MATTER OF IGWA’S SETTLEMENT
AGREEMENT MITIGATION PLAN

Idaho Ground Water Appropriators, Inc., (“IGWA”), acting for and on behalf of North Snake Ground Water District, Magic Valley Ground Water District, Carey Valley Ground Water District, American Falls-Aberdeen Ground Water District, Bingham Ground Water District, Jefferson-Clark Ground Water District, Madison Ground Water District, and Henry’s Fork Ground Water District, submits the following witness and exhibit lists pursuant to the *Witness and Exhibit Disclosure Stipulation* filed January 26, 2023, in this matter.

WITNESSES

1. Jaxon Higgs
2. Tim Deeg

Counsel for IGWA and the SWC have stipulated that Mr. Higgs and Mr. Deeg may testify on behalf of IGWA and its member ground water districts collectively. Therefore, IGWA does not anticipate calling other witnesses. However, IGWA reserves the right to call the

following witnesses if needed:


3. Mat Weaver
4. Wayne Jensen
5. Craig Evans
6. Leta Hansen
7. Kirk Jacobs
8. Jeff Raybould
9. Jason Webster
10. Dean Stevenson
11. Lynn Carlquist
12. Randy Brown
13. Any witness disclosed by any other party
14. Any witness needed to authenticate any exhibit

EXHIBITS

Enclosed herewith are two exhibits lists. The “Common Exhibits” list is submitted jointly by IGWA and the SWC. The “IGWA Exhibits” list is submitted by IGWA.

DATED this 3rd day of February, 2023.

RACINE OLSON, PLLP

By: 
Thomas J. Budge
Attorneys for IGWA

I hereby certify that on this 26th day of January, 2023, I served the foregoing document on the persons below via email as indicated:



 Thomas J. Budge

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Common Hearing Exhibits

#	Description	Authenticity	Admissibility
01	20150630 IGWA-SWC Settlement Agreement	Stipped	Stipped
02	20151014 Addendum to Settlement Agreement	Stipped	Stipped
03	20161214 Second Addendum to Settlement Agreement	Stipped	Stipped
04	20151007 A&B Agreement	Stipped	Stipped
05	20160309 SWCs and IGWAs Stipulation Mitigation Plan and Request for Order	Stipped	Stipped
06	20160422 Motion for Order Approving Stipulation	Stipped	Stipped
07	20170207 Stipulation Amended Mitigation Plan and Request for Order	Stipped	Stipped
08	20220726 Notice of Status Conference	Stipped	Stipped
09	20220721 SWC's Notice of Steering Impasse – Request of Status Conference	Stipped	Stipped
10	20220803 IGWA's Response to SWC Notice of Steering Impasse	Stipped	Stipped
11	20220812 IGWA's Supplemental Response to SWC Notice of Steering Impasse	Stipped	Stipped
12	20220818 Notice of Intent to Take Official Notice	Stipped	Stipped
13	20220823 IGWA Objection to Notice of Intent to Take Official Notice	Stipped	Stipped
14	20220908 Final Order Re Compliance with Approved Mitigation Plan	Stipped	Stipped
15	20170331 Districts Settlement Agreement Implementation Report	Stipped	Stipped
16	20180330 Districts 2017 Settlement Agreement Performance Report	Stipped	Stipped
17	20190401 Districts 2018 Settlement Agreement Performance Report – 1	Stipped	Stipped
18	20200401 Districts 2019 Settlement Agreement Performance Report1 – FINAL	Stipped	Stipped
19	20210401 Districts 2020 Settlement Agreement Performance Report	Stipped	Stipped
20	20220401 IGWA Performance Report	Stipped	Stipped
21	2022 Settlement Performance Report Recharge Documentation 20220401	Stipped	Stipped
22	20170401 Settlement Agreement Performance Report v5	Stipped	Stipped
23	20180330 Settlement Agreement Performance Report Spreadsheet	Stipped	Stipped
24	20190401 Settlement Agreement Performance Report Spreadsheet1	Stipped	Stipped
25	2020 Settlement Agreement Performance Spreadsheet 20200326	Stipped	Stipped
26	2021 Settlement Agreement Performance Spreadsheet 20210330	Stipped	Stipped
27	2022 Settlement Performance Report Spreadsheet 20220401	Stipped	Stipped
28	IDWR review of Cities 2021 Performance Report	Stipped	Stipped
29	IDWR review of IGWA 2016 Progress Report FINAL	Stipped	Stipped
30	IDWR review of IGWA 2017 Performance Report_v1	Stipped	Stipped
31	IDWR review of IGWA 2018 Performance Report (1)	Stipped	Stipped
32	IDWR review of IGWA 2018 Performance Report	Stipped	Stipped
33	IDWR review of IGWA 2019 Performance Report	Stipped	Stipped
34	IDWR review of IGWA 2020 Performance Report	Stipped	Stipped
35	IDWR review of IGWA 2021 Performance Report	Stipped	Stipped

IGWA's Hearing Exhibits

#	Description	Authenticity	Admissibility
101	20150528 Weaver Presentation	Stipped	
102	20150702 Q&A from Legal Counsel to IGWA	Stipped	
103	20150707 Letter from Legal Counsel to IGWA	Stipped	
104	20150715 District Meeting Schedule Re SWC-IGWA Settlement Agreement	Stipped	
105	20150729 (Bingham) Special Meeting Notice	Stipped	
106	20150731 Letter from SWC to IDWR	Stipped	
107	20150804 Higgs Presentation to IGWA Board	Stipped	
108	20150923 Higgs Presentation to IGWA Board	Stipped	
109	20150923 Term Sheet Implementation Agenda	Stipped	
110	20151006 Higgs Preliminary Usage 2	Stipped	
111	20151107 Higgs TWG Presentation to IGWA Board	Stipped	
112	20160104 (Magic Valley) MV 5 yr Summary Letter Final 1-4-16	Stipped	
113	20160608 Letter from Randy Budge to SWC Attorneys	Stipped	
114	20161103 Final Allocation 2016	Stipped	
115	20161115 (Magic Valley) Membership Meeting HIGGS crated 11-15-2016	Stipped	
116	20170331 District 2016 Settlement Agreement Implementation Report	Stipped	Stipped
117	20171215 SWID Mitigation Agreement	Stipped	Stipped
118	240k AF Annual Conservation	Stipped	
119	Baseline Option Example	Stipped	
120	Fixed Diversion Cap Chart	Stipped	
121	Mitigation Balance (2021) Five Year Average Chart		
122	Palmer Drought Severity Index 2010-2021		