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Attorneys for Respondents

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

RANGEN, INC.,

Petitioner,

vs.

THE IDAHO DEPARTMENT OF WATER
RESOURCES and GARY SPACKMAN, in
his capacity as Director of the Idaho
Department of Water Resources,

Respondents,

IDAHO GROUND WATER
APPROPRIATORS, INC., FREMONT
MADISON IRRIGATION DISTRICT,
BURLEY IRRIGATION DISTRICT,
MILNER IRRIGATION DISTRICT,
AMERICAN FALLS RESERVOIR
DISTRICT #2, MINIDOKA IRRIGATION
DISTRICT, NORTH SIDE CANAL

Case No. CV-2014-1338

(Consolidated Gooding County Case No.
CV-2014-179)

AFFIDAVIT OF JENNIFER S. SUKOW

COMPANY, TWIN FALLS CANAL
COMPANY, AND THE CITY OF
POCATELLO,

Intervenors.

STATE OF IDAHO)
) ss.
County of Ada)

Jennifer S. Sukow, being first duly sworn, deposes and states as follows:

1. My name is Jennifer S. Sukow. I am a Technical Engineer II for the Hydrology Section of the Idaho Department of Water Resources (IDWR). I am a Licensed Professional Engineer in Idaho and Oregon. I am also a Licensed Professional Geologist in Idaho. I have a Bachelor of Science degree in Environmental Geology and Technology (Water Resources) from University of North Dakota. I also have a Masters of Science degree in Civil and Environmental Engineering from Utah State University.

2. As part of my duties at IDWR, I helped develop and currently help maintain the Eastern Snake Plain Aquifer model. I am familiar with the design of the model.

3. I am competent to testify in this matter.

4. Rangen's source (Curren Tunnel) is located in ESPA model cell 1042013, commonly called the Rangen model cell.

5. The source for Billingsley Creek Ranch's water rights is Hewitt and Potter Springs. These sources are located in ESPA model cells 1040013 and 1040014.

6. Aquarius Aquaculture diverts from springs tributary to Billingsley Creek. The sources are located in ESPA model cell 1039014, commonly called the Big Springs model cell.

7. Ark Fisheries, Inc. diverts from Spring Creek in ESPA model cell 1041013, commonly called the Three/Weatherby model cell.

8. LynClif Farms diverts from Billingsley Creek at the Padgett Ditch. There are six ESPA model cells that contain springs tributary to Billingsley Creek upstream of LynClif's point of diversion.

9. Most of the ESPA model cells containing the sources for these water rights also contain other spring sources not diverted by the calling parties.

10. Determinations of material injury and of other items considered by the Director in the pending delivery calls may be different from the determinations made in the Rangen proceeding given the case-specific nature of the analysis conducted in a delivery call pursuant to the conjunctive management rules and the difference in the sources for these water rights.

11. To my knowledge, no hearings have been held and the Director has not issued any orders deciding the validity of the pending delivery calls listed in the Brendecke Affidavit.


DATED this 25th day of June, 2014.



Jennifer S. Sukow

SUBSCRIBED AND SWORN to before me this 25th day of June, 2014.





Notary Public for the State of Idaho
Residing at: Harma, Idaho
My commission expires: 12/6/18

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of June, 2014, I caused a true and correct copy of the foregoing **Affidavit of Jennifer S. Sukow** to be filed with the Court and served on the following parties by the indicated methods:

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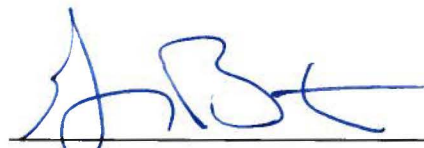
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