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

**IN THE MATTER OF BIG WOOD RIVER
GROUND WATER MANAGEMENT AREA**

**IN THE MATTER OF APPLICATIONS FOR
PERMITS FOR THE DIVERSION AND USE
OF SURFACE AND GROUND WATER
WITHIN THE SNAKE RIVER BASIN**

**MUNICIPAL PROVIDERS'
JOINT DISCLOSURE OF
PROPOSED EXHIBITS FOR
HEARING**

The City of Idaho Falls, City of Pocatello, City of Hailey, City of Bellevue, City of Ammon, Coalition of Cities¹, Falls Water Co., Inc., Veolia Water Idaho, Inc. (“Veolia”), and Wellsprings Group, LLC (collectively, “Municipal Providers”) hereby submit this *Joint*

¹ The Coalition of Cities includes the Cities of Bliss, Burley, Carey, Declo, Dietrich, Gooding, Hazelton, Heyburn, Jerome, Paul, Richfield, Rupert, Shoshone, and Wendell.

Disclosure of Proposed Exhibits for Hearing in compliance with the *Order Consolidating Proceedings for Hearing, Authorizing Discovery, and Scheduling; Notice of Hearing* (“*Scheduling Order*”), issued by the Director of the Idaho Department of Water Resources (“IDWR” or “Department”) on March 31, 2023.

Municipal Providers’ Exhibit No.	Exhibit Description
	ORDERS
300	5/17/2022 Order Establishing Moratorium (Cefalo Dep. Ex. 2)
301	10/21/2022 Amended Snake River Basin Moratorium Order (Cefalo Dep. Ex. 3)
	DEPOSITION NOTICES & TRANSCRIPTS
302	4/27/2023 Notice of Deposition of James Cefalo, IDWR Eastern Regional Manager (Cefalo Dep. Ex. 1)
303	5/11/2023 Deposition Transcript of James Cefalo, IDWR Eastern Regional Manager
	DEPOSITION EXHIBITS
304	Idaho Code section 42-202B (Cefalo Dep. Ex. 4)
305	Definitions section from IDAPA 58.01.08 (Cefalo Dep. Ex. 5)
	EXPERT REPORTS & ATTACHMENTS
306	7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
307	Figure 1-1 from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
308	Table 2-1 from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
309	Table 5-1 from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
310	Table 5-2 from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
311	Appendix A from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
312	Appendix B from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
313	Appendix C from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of Municipal Providers
314	7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of City of Bellevue and City of Hailey

Municipal Providers' Exhibit No.	Exhibit Description
315	Figure 1-1 from 7/11/2023 Expert Report of Gregory K. Sullivan, P.E. on Behalf of City of Bellevue and City of Hailey
316	7/11/2023 Expert Report of Terry Scanlan, P.E., P.G., on Behalf of Veolia Water Idaho, Inc.
	SUMMARY JUDGMENT MOTION AND BRIEFING
317	8/30/2023 Municipal Providers' Motion for Partial Summary Judgment
318	8/30/2023 Municipal Providers' Memorandum in Support of Motion for Partial Summary Judgment
319	8/30/2023 Affidavit of Maximilian C. Bricker in Support of Municipal Providers' Motion for Partial Summary Judgment
320	9/13/2023 Surface Water Coalition's Response to Cities' Motion for Partial Summary Judgment
321	9/13/2023 Declaration of Travis L. Thompson in Support of Surface Water Coalition's Response in Opposition to Cities' Motion for Partial Summary Judgment
322	9/20/2023 Municipal Providers' Reply in Support of Motion for Partial Summary Judgment
323	9/20/2023 Municipal Providers' Errata to Motion for Partial Summary Judgment
	OTHER DOCUMENTS
324	8/11/2023 Email from James Cefalo re Applications for Transfer 87984 and 87987 (City of Heyburn)
325	9/20/2023 Email from James Cefalo re Applications for Transfer 87984 and 87987 (City of Heyburn)
326	6/30/2023 IDWR Approval of Sun Valley Water & Sewer District Water Right Transfer No. 84041
327	City of Bellevue's Reuse Permit
328	City of Pocatello's NPDES Permit No. ID0021784
329	City of Pocatello's Water Production Data (1/2017-8/2023)
330	City of Pocatello Wastewater Discharge Data (1/2018-8/2023)
331	City of Heyburn Transfer Nos. 87984 & 87987
332	Coalition of Cities – Summary of Water Rights
333	City of Pocatello – Summary of Water Rights
334	City of Idaho Falls – Summary of Water Rights
335	City of Ammon – Summary of Water Rights
336	City of Bellevue – Summary of Water Rights
337	City of Hailey – Summary of Water Rights
338	Veolia Water Idaho, Inc. – Summary of Water Rights
339	Falls Water Co., Inc. – Summary of Water Rights
340	Wellsprings Group, LLC – Summary of Water Rights

Municipal Providers' Exhibit No.	Exhibit Description
341	Veolia Water Idaho, Inc., Water Production Data
342	City of Boise Water Renewal Facility Utility Plan (Sep. 1, 2020)
343	Report on Canal Deliveries from Boise River and Different Features Affecting these Deliveries for the Irrigation Season 2020, by Rex Barrie, Watermaster, Boise River
344	City of Hailey's Water Production and Wastewater Discharge Data (2018-2022)
345	City of Hailey's Water Production Data (2013-2018)
346	City of Idaho Falls' NPDES Permit No. ID0021261
347	Discovery Responses from all Parties
348	All exhibits required for cross-examination or rebuttal

DATED this 2nd day of October 2023.

SOMACH SIMMONS & DUNN, P.C.



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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of October, 2023, a true and correct copy of the foregoing document was served by email and addressed to the following:

<p>Gary Spackman, Director Mat Weaver, Acting Director IDAHO DEPARTMENT OF WATER RESOURCES PO Box 83720 Boise, ID 83720-0098 Gary.Spackman@idwr.idaho.gov Mathew.weaver@idwr.idaho.gov file@idwr.idaho.gov</p>	<p>Garrick L. Baxter Deputy Attorney General Idaho Department of Water Resources PO Box 83720 Boise, ID 83720-0098 Garrick.baxter@idwr.idaho.gov</p>
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