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Department of Water Resources

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Attorneys for the United States of America

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

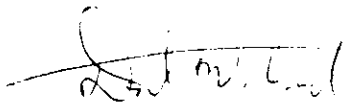
In Re SRBA	)	Subcase Nos. 65-11412 and 65-11412A
	)	
Case No. 39576	)	NOTICE OF SERVICE OF
	)	UNITED STATES' RESPONSES TO
	)	EMMETT IRRIGATION DISTRICT'S
	)	FIRST SET OF INTERROGATORIES,
	)	REQUESTS FOR ADMISSIONS AND
	)	REQUESTS FOR PRODUCTION TO
	)	THE UNITED STATES OF AMERICA,
	)	THROUGH THE BUREAU OF
	)	RECLAMATION
	)	

COMES NOW the United States by and through its counsel of record, David W. Gehlert, and pursuant to Idaho Rules of Civil Procedure 33(a)(5), 34(d) and 36(c)(2) hereby gives notice that on the 20th day of December 2002, the United States' Responses to Emmett Irrigation District's First Set of Interrogatories, Requests for Admissions and Requests for Production to

**Notice of Service of United States' Responses to Emmett Irrigation District's
First Set of Interrogatories, Requests for Admissions and Requests for Production
to the United States of America, Through the Bureau of Reclamation - Page 1**

the United States of America, Through the Bureau of Reclamation were served upon Scott L. Campbell, Attorney for the Emmett Irrigation District.

Dated this 20th day of December 2002:

A handwritten signature in dark ink, appearing to read "David W. Gehlert", written over a horizontal line.

David W. Gehlert
Attorney for the United States

Certificate of Service

I certify that on this 27th day of December 2002, I caused to be served a true and correct copy of the foregoing **NOTICE OF SERVICE OF THE UNITED STATES' RESPONSES TO EMMETT IRRIGATION DISTRICT'S FIRST SET OF INTERROGATORIES, REQUESTS FOR ADMISSIONS AND REQUESTS FOR PRODUCTION TO THE UNITED STATES OF AMERICA, THROUGH THE BUREAU OF RECLAMATION** by placing a copy thereof in the United States mail, postage pre-paid, and addressed as follows:

via Federal Express mail:

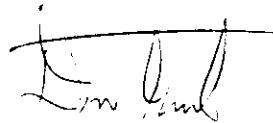
CLERK OF THE SRBA COURT (Original)
SRBA Courthouse
District Court
253 Third Ave. North
Twin Falls, Idaho 83301

Scott L. Campbell
Moffatt, Thomas, Barrett, Rock
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101 S. Capitol Blvd., 10th Floor
Boise, ID 83701

via First-Class Mail:

United States Department of Justice
Environment and Natural Resources Division
550 West Fort Street
MSC Box 033
Boise, ID 83724

IDWR
Document Depository
P.O. Box 83720
Boise, ID 83720-0098



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GENERAL OBJECTIONS

1. The United States objects to any and all definitions, instructions and requests, or any part thereof, to the extent that they call for material subject to the attorney-client privilege, the work product doctrine, investigative privilege or any other privilege, immunity or statutory prohibition. This objection is intended to apply to all discovery requests that seek such information.

2. The United States objects to any and all requests, or any part thereof, to the extent that they require identification of facts or information not relevant to the above-captioned subcases and outside the scope of discovery.

3. The United States objects to any and all requests, or any part thereof, to the extent they purport to impose burdens on the United States in excess of those allowed by the Idaho Rules of Civil Procedure.

4. The United States objects to any and all requests, or any part thereof, to the extent they require identification of facts and information that are proprietary, confidential, sensitive, private, and/or that for any reason should be subject to limitations regarding use, dissemination and publication absent an appropriate confidentiality agreement and/or protective order restricting the use, dissemination and publication of such materials and information.

5. No incidental or implied admissions are intended. The fact that the United States has responded to all or part of a request for admission is not intended to, and shall not be construed to be, a waiver by the United States of all or part of any objection, or to other requests for admission. The United States answers to any discovery requests herein do not constitute a

waiver of the United States right to object to any future additional, or supplemental discovery requests regarding the same or similar matters.

RESPONSES

REQUEST FOR ADMISSION NUMBER 1: Please admit that the United States entered into a contract with the Emmett Irrigation District on November 18, 1921, arranging for the construction of Black Canyon Dam.

RESPONSE: Objection. The phrase "arranging for the construction of Black Canyon Dam" is vague and ambiguous. Moreover, the terms of the referenced contract speak for themselves. Without waiving any objections, the United States responds that it entered into Repayment Contract Ilr-699 dated November 18, 1921 ("1921 contract") with the Emmett Irrigation District. Among other things, Repayment Contract Ilr-699 addressed the terms by which the Emmett Irrigation District would repay the United States for the cost of the construction of Black Canyon Dam. The authorization for Black Canyon Dam states: "On the 18th day of November, 1921, the United States entered into a contract with the Emmett Irrigation District in southern Idaho for the construction of a dam on the Payette River at a point known as Black Rock Canyon."

REQUEST FOR PRODUCTION NUMBER 1: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 1.

RESPONSE: The 1921 contract is attached at Bates range EID 00001- EID 00040. The authorization for Black Canyon Dam is attached at Bates range EID 00300 - EID 00301.

REQUEST FOR ADMISSION NUMBER 2: Please admit that prior to the 1921 contract between the United States and the Emmett Irrigation District, the Emmett Irrigation District owned and operated a dam and diversion works that were subsequently replaced by the Black Canyon Dam and diversion works pursuant to the terms of the 1921 contract.

RESPONSE: Objection. The terms of the 1921 contract speak for themselves. Without waiving any objections, the United States responds that upon information and belief, at the time of the 1921 contract Emmett Irrigation District owned and operated a crib dam and diversion works. Article 42 of the 1921 Contract states that "....said works to be constructed by the United States [Black Canyon Dam] will serve as a substitute for the operation and maintenance of the said old diversion dam and said sixteen (16) miles of main canal [Emmett Irrigation District's then existing crib dam and main canal]." The authorization for Black Canyon Dam describes the Dam as "tak[ing] the place of the long canal built in the canyon and heading about 16 miles above the dam site."

INTERROGATORY NUMBER 1: If your response to Request for Admission Number 2 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 2.

RESPONSE: See Response to Request for Admission No. 2.

REQUEST FOR PRODUCTION NUMBER 2: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 2 and Interrogatory Number 1.

RESPONSE: The 1921 Contract is attached at Bates range EID 00001- EID 00040; the authorization is attached at Bates range EID 00300 - EID 00301.

REQUEST FOR ADMISSION NUMBER 3: Please admit that the United States' construction of the Black Canyon Dam was subject to the approval of the Emmett Irrigation District and was also conditioned upon Emmett Irrigation District receiving, in perpetuity, the full measure of its senior appropriative water rights as memorialized by the 1921 contract.

RESPONSE: Denied.

INTERROGATORY NUMBER 2: If your response to Request for Admission Number 3 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 3.

RESPONSE: Article 25 of the 1921 contract states that construction of what became Black Canyon Dam was "subject to the appropriation of the necessary funds from time to time by Congress." Article 49 of the 1921 Contract states that contract would neither bind nor obligate the United States until the contract was "authorized by the necessary majority of the electors of the District" and those proceedings confirmed by Decree of Court. Article 28 of the 1921 contract provides that the United States' obligations under the contract are contingent on Emmett Irrigation District complying with the terms and conditions of the contract. Article 47 provides conditions under which the contract can be terminated.

REQUEST FOR PRODUCTION NUMBER 3: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 3 and Interrogatory Number 2.

RESPONSE: The 1921 contract is attached at Bates range EID 00001 - EID 00040.

REQUEST FOR ADMISSION NUMBER 4: Please admit that the construction of Black Canyon Dam required the movement of Emmett Irrigation District's original point of diversion.

RESPONSE: Objection. The reference to Emmett Irrigation District's original point of diversion is vague and ambiguous. Without waiving any objections, the United States responds that to the extent Emmett is referring to the point of diversion associated with their crib dam, the request is denied.

INTERROGATORY NUMBER 3: If your response to Request for Admission Number 4 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 4.

RESPONSE: The United States lacks sufficient information to be able to state whether the construction of Black Canyon Dam required movement of Emmett's point of diversion; however, upon information and belief, Emmett retained the legal right to divert water from the point of diversion associated with their crib dam until January 30, 1952.

REQUEST FOR PRODUCTION NUMBER 4: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 4 and Interrogatory Number 3.

RESPONSE: Orders Granting Change of Point of Diversion issued by the Idaho Department of Reclamation on January 30, 1952 are attached at Bates range EID 00296 - EID 00299.

REQUEST FOR ADMISSION NUMBER 5: Please admit that as a result of that moved point of diversion, the United States installed hydro-pumps at the Black Canyon facility to pump water into Emmett Irrigation District's North Side Canal.

RESPONSE: Denied.

INTERROGATORY NUMBER 4: If your response to Request for Admission Number 5 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 5.

RESPONSE: The United States installed hydro-pumps in Black Canyon dam and has used those pumps to deliver water into Emmett Irrigation District's North Side Canal pursuant to the terms of contracts between the parties. To the United States' knowledge, the hydro-pumps were not installed as a result of Emmett Irrigation District's point of diversion being moved. According to a letter from Emmett Irrigation District to Representative French, because the dam was not high enough for gravity delivery of water to Emmett's North Side Canal, "a directly driven (by water) pumping plant was installed to lift the water into that canal."

REQUEST FOR PRODUCTION NUMBER 5: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 5 and Interrogatory Number 4.

RESPONSE: An article *Black Canyon Power and Pumping Plant, Boise Project Idaho*, New Reclamation Era, February 1928 is attached at Bates ranges EID 000277 - EID 000278. The letter to Rep. French is attached at Bates ranges EID 000279 - EID 00295.

REQUEST FOR ADMISSION NUMBER 6: Please admit that the hydro-pumps needed to pump water into Emmett Irrigation District's North Side Canal, and the water rights necessary to operate those pumps, were prerequisites to Emmett Irrigation District's approval of the United States' actions in moving Emmett Irrigation District's point of diversion to build the Black Canyon facility pursuant to the 1921 contract.

RESPONSE: Objection. The request is vague and ambiguous in identifying Emmett Irrigation District's approval. Without waiving any objections, the United States responds that it lacks sufficient information to admit or deny this request.

INTERROGATORY NUMBER 5: If your response to Request for Admission Number 6 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 6.

RESPONSE: Objection. The request is vague and ambiguous in identifying Emmett Irrigation District's approval. Without waiving any objections, the United States responds that it lacks a basis to know what the prerequisites were for Emmett's approval of the 1921 contract.

REQUEST FOR PRODUCTION NUMBER 6: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 6 and Interrogatory Number 5.

RESPONSE: No response necessary.

REQUEST FOR ADMISSION NUMBER 7: Please admit that without the hydro-pumps and the water needed to operate them, the current location/operation of Black Canyon

Dam makes it impossible for Emmett Irrigation District to divert water to its North Side Canal without additional costs and expenses.

RESPONSE: Objection. The Request is vague and ambiguous regarding what the "costs and expenses" of the hydro-pumps are to be compared to. Without waiving any objections, the United States responds that the request is denied.

INTERROGATORY NUMBER 6: If your response to Request for Admission Number 7 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 7.

RESPONSE: Objection. The Request is vague and ambiguous regarding what the "costs and expenses" of the hydro-pumps are to be compared to. Without waiving any objection, the United States responds that to the extent Emmett Irrigation District is intending "the water needed to operate" the hydro-pumps to mean the water rights at issue in this litigation, and "at no additional cost" to be no cost greater than that provided by the terms of the contract between the United States and the Emmett Irrigation District, water can be diverted to Emmett's North Side Canal pursuant to the contract at no additional cost. Moreover, Emmett Irrigation District can use its hydroelectric pumps to pump water into the North Side Canal. The United States acknowledges that Emmett Irrigation District cannot divert its full demand for irrigation water through those pumps. The United States lacks sufficient knowledge to compare the costs of the hydroelectric pumps with those of the hydro-pumps.

REQUEST FOR PRODUCTION NUMBER 7: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 7 and Interrogatory Number 6.

RESPONSE: The October 4, 1955 contract between the United States and Emmett Irrigation District is attached at Bates range EID 00188- EID 00222.

REQUEST FOR ADMISSION NUMBER 8: Please admit that the amount of water needed to operate the hydro-pumps is 220 cubic feet per second.

RESPONSE: Denied.

INTERROGATORY NUMBER 7: If your response to Request for Admission Number 8 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 8.

RESPONSE: The United States can operate the pumps with less than 220 cubic feet per second of water.

REQUEST FOR PRODUCTION NUMBER 8: Please produce each and every document which supports or tends to support your response to Request for Admission Number 8 and Interrogatory Number 7.

RESPONSE: None identified.

REQUEST FOR ADMISSION NUMBER 9: Please admit that the United States Bureau of Reclamation, is at most, the owner of legal title to the water rights necessary to operate the hydro-pumps needed to pump water into Emmett Irrigation District's North Side Canal.

RESPONSE: Objection. The request calls for a legal conclusion and seeks the mental impressions of counsel. Without waiving any objections, the United States responds that the request is denied.

INTERROGATORY NUMBER 8: If your response to Request for Admission Number 9 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 9.

RESPONSE: Objection. The request calls for a legal conclusion and seeks the mental impressions of counsel. Without waiving any objections, the United States responds that water right 65-11412, recognizing the United States' right to use 220 cfs of water from the Payette River for power purposes was decreed to the United States in the Payette Adjudication on January 4, 1989. The United States is the beneficial user of that right, which grants the United States the right to use water "necessary to operate the hydro-pumps." The parties contract dated October 4, 1955 confirms the United States' ownership of those rights. Article 12(a) provides that title to Black Canyon and Deadwood Dams and Reservoir, including all properties incidental and appurtenant thereto, and all other reserved works, shall remain in the United States until otherwise provided by the Congress.

REQUEST FOR PRODUCTION NUMBER 9: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 9 and Interrogatory Number 8.

RESPONSE: Attached hereto is the contract dated October 4, 1955 at Bates range EID 00188 - EID 00222; the Partial Decree dated January 4, 1989 and stipulation dated November 21, 1988 referenced therein at Bates ranges EID 00271 - EID 00276.

REQUEST FOR ADMISSION NUMBER 10: Please admit that the hydro-pump operation water rights are held by the United States for the benefit of Emmett Irrigation District, in perpetuity, to fulfill the United States' contractual obligation to supply and in no way impair, the senior appropriation rights of Emmett Irrigation District.

RESPONSE: Denied.

INTERROGATORY NUMBER 9: If your response to Request for Admission Number 10 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 10.

RESPONSE: The United States responds that the hydro-pump operation water rights are held by the United States as part of the reserve works for the Boise Project and that pursuant to the terms of the October 4, 1955 contract the United States uses those water rights to deliver water to the Emmett Irrigation District. The United States admits that the 1955 Contract imposes an obligation to deliver Emmett Irrigation District's water rights consistent with the terms and conditions of the contract so long as Emmett meets its obligations under the contract.

REQUEST FOR PRODUCTION NUMBER 10: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 10 and Interrogatory Number 9.

RESPONSE: The 1955 contract is attached at Bates range EID 00188 - EID 00222.

REQUEST FOR ADMISSION NUMBER 11: Please admit that the 220 cubic feet per second of water used to operate the hydro-pumps is used solely to enable Emmett Irrigation District to exercise its senior water rights and divert water into its North Side Canal as required by the 1921 contract.

RESPONSE: Denied.

INTERROGATORY NUMBER 10: If your response to Request for Admission Number 11 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 11.

RESPONSE: The 220 cfs of water referenced in the request is used to operate the hydro-pumps. Pursuant to the terms of the 1955 contract, the hydro-pumps are used to lift Emmett Irrigation District's water into the North Side Canal.

REQUEST FOR PRODUCTION NUMBER 11: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission Number 11 and Interrogatory Number 10.

RESPONSE: The 1955 contract is attached at Bates range EID 00188 - EID 00222.

REQUEST FOR ADMISSION NUMBER 12: Please admit that no agreement subsequent to the original 1921 contract between the United States and Emmett Irrigation District has ever altered the United States' obligation to provide Emmett Irrigation District with the full measure of its senior water right in perpetuity by whatever means necessary.

RESPONSE: Objection. The request calls for a legal conclusion and the mental impressions of counsel. Without waiving any objections, the response is denied.

INTERROGATORY NUMBER 11: If your response to Request for Admission Number 12 is anything other than an unqualified admission, please set forth each and every fact of which you are aware which supports or tends to support, in whole or in part, your response to Request for Admission Number 12.

RESPONSE: Contracts subsequent to the 1921 contract have altered the United States' contractual obligations to the Emmett Irrigation District. Moreover, the 1921 contract did not obligate the United States to "provide Emmett Irrigation District with the full measure of its senior water right in perpetuity by whatever means necessary." *See e.g.* Articles 28, 29, 30, 47 and 55.

REQUEST FOR PRODUCTION NUMBER 12: Please produce each and every document which supports or tends to support, in whole or in part, your response to Request for Admission number 12 and Interrogatory Number 11.

RESPONSE: Attached hereto at Bates range EID 00001 - EID 00222 are all known contracts between the United States and Emmett Irrigation District addressing use of Black Canyon Dam.

REQUEST FOR PRODUCTION NUMBER 13: Please produce any and all agreements between the United States and Emmett Irrigation District relating to any water appropriation or water storage in basin 65, including but not limited to, the original 1921 contract, the November 6, 1923 contract, the June 17, 1931 contract, the June 30, 1932 contract and the October 4, 1955 contract.

RESPONSE: All contracts between the United States and Emmett Irrigation District relating to any water appropriation or water storage in basin 65 are identified below and attached at Bates range EID 00001 - EID 00270.

<u>Contract</u>	<u>Identifier</u>
Nov. 18, 1921	Ilr-699
November 6, 1923	Ilr-699
June 17, 1931	Ilr-699
June 30, 1932	Ilr-699
August 8, 1932	I4r-232
July 18, 1934	Ilr-699
Oct 2, 1951	Ilr-699
Jun 6, 1952	Ilr-699
Jun 2, 1953	Ilr-699
Apr 6, 1954	Ilr-699
May 3, 1955	Ilr-699
October 4, 1955	14-06-100-827
July 27, 1988	8-07-10-W0724
Feb 8, 1989	8-07-10-W0742
Jul 3, 1989	9-07-10-W0757
Feb 12, 1990	14-06-100-827 Amend No. 1

INTERROGATORY NUMBER 12: Please identify the lay witnesses you may call to testify at the trial of this matter.

RESPONSE: The United States has not determined who it would call as a lay witness in the trial of this matter. Witnesses who have knowledge of facts related to the subject matter of the claim in this proceeding and could be called include:

1. Jerrold D. Gregg, Area Manager, Snake River Area Office, 214 Broadway Avenue, Boise, Idaho 83702. Mr. Gregg is ultimately responsible for all operations and facilities in the Snake River Area.

2. Steven M. Jarsky, Supervisory Electrical Engineer, Operation and Maintenance Technical Services Manager, 214 Broadway Avenue, Boise, Idaho 83702. Mr. Jarsky is responsible for supervision, operation and maintenance, repair and improvement of all facilities, dams, power plants in the western part of the Snake River Area, including the hydro-pumps in Black Canyon Dam.

3. Richard F. Wells, Hydraulic Engineer, Water Operations Manager-214 Broadway Avenue, Boise, Idaho 83702. Mr. Wells is responsible for regulating releases from Cascade and Deadwood reservoirs. He has knowledge on the management and coordination of reservoir and river operations for the Boise and Payette River Basins.

4. Ernest D. Bachman, Mechanical Engineer, 214 Broadway Avenue, Boise, Idaho 83702. Mr. Bachman is familiar with the design and operation of the hydro-pumps, turbines, valves, penstock and other features of Black Canyon Dam.

5. Terry R. Allison, Control Center Operators Work leader, Black Canyon Field Station, 3999 East Black Canyon Highway, Emmett, Idaho 83617. Mr. Allison manages and

supervises the powerplant operators. He has knowledge regarding water orders addressing hydro-pump operations and how the pumps are operated.

6. Robert L. Adams, Facility Manager, Black Canyon Dam, Black Canyon Field Station, 3999 East Black Canyon Highway, Emmett, Idaho 83617. Mr. Adams has knowledge regarding the operation of Black Canyon Dam.

7. Ryan Patterson, Program Manager, Repayment and Acreage Limitation, Regional Office of the Pacific Northwest Region of the Bureau of Reclamation, 1150 N. Curtis Rd, Suite 100, Boise, ID 83706. Mr. Patterson has knowledge regarding the terms of the contracts.

8. Dala Walton, Water Rights Specialist, Snake River Area Office 1359 Hansen Avenue, Burley, Idaho 83318. Ms. Walton has knowledge of the United States' claims.

9. Larry Parsons, Economist, 1150 N. Curtis Rd, Boise ID 83706, Attention PN-3323. Mr. Parsons has knowledge regarding the terms of the contracts.

INTERROGATORY NUMBER 13: Please identify the expert witnesses you may call to testify at the trial of this matter. In addition to the identity of any expert witness you may call, Emmett Irrigation District seeks:

- a) The subject matter upon which each expert is expected to testify;
- b) The substance of the opinions to which each expert is expected to testify;
- c) The underlying facts and data upon which each expert opinion is based.

RESPONSE: The United States has not identified any witness it will call to testify as an expert in the trial of this matter. Persons who could be called include individual identified under Interrogatory No. 12. The United States reserves the right to supplement this answer.

REQUEST FOR PRODUCTION NUMBER 14: Please produce the curriculum vitae of each person identified in your response to Interrogatory Number 13.

RESPONSE: See Response to Interrogatory No. 13.

REQUEST FOR PRODUCTION NUMBER 15: Please produce each and every document upon which you relied in preparing your response to Interrogatory Number 13.

RESPONSE: See Response to Interrogatory No. 13.

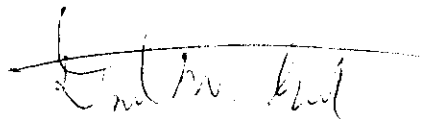
In accordance with Idaho Rules of Civil Procedure 26(e), the United States reserves the right to supplement responses to the Emmett Irrigation District's Interrogatories, Requests for Admissions, and Requests for Production to the United States of America through the Department of the Interior, Bureau of Reclamation.

DATED this 25th day of December 2002.

UNITED STATES OF AMERICA

Attorneys' Names and Addresses:

THOMAS L. SANSONETTI
Assistant Attorney General
Environment and Natural Resources Division



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The following attachments can be found in the legal file and repository.

Boise Project Contract Nov. 18, 1921 Emmett Irrig Dist
Boise Project Contract Nov. 6, 1923 Emmett Irrig Dist
Boise Project Contract June 17, 1931 Emmett Irrig Dist
Boise Project Contract June 30, 1932 Emmett Irrig Dist
Dept of The Interior Bureau of Rec Boise Project, Idaho
Boise Project Contract July 18, 1934 Emmett Irrig Dist
US Dept of Interior Record of Execution of Contract
US Dept of Interior Contract between the US and Emmett Irrig Dist
For Rehabilitation and Betterment
US Dept of Interior Drought Emergency Contract for Irrig Water Service
US Dept of Interior Contract for Cascade Reservoir Storage
US Dept of Interior Conveyance, Release and Amendment
Partial Decree Pursuant to Rule 54 (b) IRCP
Stipulation Resolving Late Objection of the US Bureau of Rec
Article – Black Canyon Power and Pumping Plant
Correspondence dated 11/18/1930 to Hon. Burton French from Emmett Irrig Dist
Order Granting Change of Point of Diversion No. 211
Order Granting Change of Point of Diversion No. 212
Bureau of Rec Project Feasibilities and Authorizations 1957 Edition pgs 132 & 133