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**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	)	
	)	
Case No. 39576	)	Subcase Nos. 63-3618
	)	
	)	AMENDED AFFIDAVIT OF
	)	MARY MELLEMA
_____	)	
STATE OF IDAHO	)	
	) ss.	
County of Ada	)	

I, MARY MELLEMA, being duly sworn upon oath, state as follows:

1. I am a hydrologist with River and Reservoir Operations Group (RROG), Pacific Northwest Regional Office of the Bureau of Reclamation. I have served as a hydrologist for RROG since 2001. Prior to that I was a service hydrologist with the National Weather Service (NWS) in Boise, Idaho for 10 years. In my current capacity I conduct various studies of reservoir operations and also make real time decisions of reservoir operations of Federal reservoirs in the

operations and also make real time decisions of reservoir operations of Federal reservoirs in the Pacific-northwest region.

2. I am knowledgeable about reservoir operations of Arrowrock, Anderson Ranch, and Lucky Peak reservoirs. This knowledge is based on my experience. I have been the Regional Boise River operations contact since 2004. In that capacity I have analyzed historic water supply conditions in the Boise basin and have developed operational tools to plan real-time operations of each of the reservoirs. I have operated the Boise reservoirs during a variety of water supply conditions and have examined the runoff patterns of the basin and how the reservoirs react.

3. One of my primary responsibilities is to provide analyses regarding flood control operations for the three reservoir system consisting of Arrowrock, Anderson Ranch, and Lucky Peak reservoirs. These analyses included forecasting and routing of runoff in the Boise basin and planning reservoir releases. Flood control operations are necessary in many years to avoid potentially damaging floods from impacting the City of Boise and other downstream communities. Flood control operations are carried out jointly by Reclamation and the Army Corps of Engineers pursuant to the criteria set forth in the 1985 Water Control Manual, a true and correct copy of which is attached hereto as Exhibit A. Pursuant to the Water Control Manual, space in all three reservoirs—Arrowrock, Anderson Ranch, and Lucky Peak—is allocated for flood control. The space allocations for flood control are as follows: Arrowrock (272,000 acre feet), Anderson Ranch (413,000 acre feet), and Lucky Peak (264,000 acre feet).

4. I am familiar with the water right accounting system of the flow for the Boise Project. The “Boise Water Rights Accounting Computer Program” is maintained and operated by the

Idaho Department of Water Resources and is used to account for water that fills the Boise Project storage water rights. After flood control operations have occurred and the reservoirs fill to the maximum reservoir level expected to occur during that irrigation season, IDWR uses the Boise River Storage Program to allocate storage to the various contractors and purposes. At this time any shortages that need to be made up to the various Reclamation contractors in Anderson and Arrowrock, due to flood operations in the Boise Project, pursuant to the 1985 Water Control Manual and contracts, occurs. The storage allocation for each Reclamation contractor is then input into the Accounting model, which is used to account for water used for the rest of the water year.

5. For purposes of this case, I reviewed the flood control releases for the Boise Project reservoirs since the time when Lucky Peak was first brought into operation to the present. I looked specifically for years in which Arrowrock and Anderson Ranch reservoirs did not physically fill due to flood control releases. I conducted my research by looking at the bound books, published by IDWR, entitled "Report on Canal Deliveries from Boise River and Different Features Affecting These Deliveries for the Irrigation Season." This research revealed that Arrowrock and Anderson Ranch reservoirs did not physically fill in the following years due to flood releases:

Year	Amount of Space Not Filled In Anderson and Arrowrock	Amount of Space in the accounting that filled for Anderson and Arrowrock
1972	22,393 acre-ft	100%
1974	30,367 acre-ft	100%
1975	71,448 acre -ft	100%
1976	33,363 acre-ft	100%
1978	96,857 acre ft	100%

1989	126,473 acre-ft	100%
1993	15,372 acre-ft	100%
1999	6,968 acre-ft	100%

6. For each of those years described in Paragraph 5, above, I was asked to determine how storage water between the three reservoirs—Arrowrock, Anderson Ranch, and Lucky Peak—was accounted for by the watermaster for Water District 63 for purposes of water rights administration. To answer this question, I reviewed the watermaster reports for each of the years identified in Paragraph 5. For each year examined, the watermaster reports show that the storage rights for Arrowrock and Anderson Ranch received their full allocation of storage water under the respective water rights for those reservoirs. This shows that the fact Arrowrock and Anderson Ranch reservoirs did not fill physically in those years because of releases required by flood control operations did not effect the water right storage allocations for those two reservoirs. As a matter of state water rights administration, the watermaster for Water District 63 allocated full supplies to the Arrowrock and Anderson Ranch storage rights. Attached as Exhibit B are copies of relevant pages of the watermaster reports showing the allocations to Arrowrock and Anderson Ranch for the years indicated above.

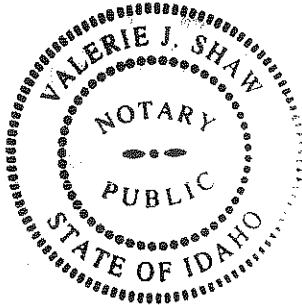
7. The reduction in storage allocation for those years described in Paragraph 5, above, came solely from Lucky Peak.

Further your affiant sayeth naught.

DATED this 5th Day of Feb 2008.

Mary Mellema
Mary Mellema
Hydrologist

SUBSCRIBED AND SWORN to before me this 5th Day of Feb, 2008.



Notary Public for Idaho Valerie J Shaw
Residing at: Meridian
My Commission Expires: 6/2/2012