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Attorneys for Pioneer Irrigation District
and Settlers Irrigation District

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 No. 63-03618
(Lucky Peak Project)

AFFIDAVIT OF NAIDA KELLEHER

STATE OF IDAHO)
) ss.
County of Canyon)

I, NAIDA KELLEHER, being first duly sworn upon oath, depose and state as
follows:

1. I am the current secretary of the Pioneer Irrigation District ("PID"). I have
access to PID's files and make this affidavit based on personal knowledge.

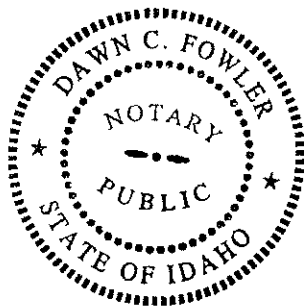
2. I have reviewed all of PID's correspondence files and meeting minutes for the calendar years 1982 through 1985 for references to the Water Control Manual the United States asserts now governs Boise Project reservoir operations.

3. No reference to the Water Control Manual was located in said records review.

DATED this 13th day of February 2008.

Naida E. Kelleher
NAIDA KELLEHER

SUBSCRIBED AND SWORN to before me this 13th day of February 2008.



Dawn C. Fowler
NOTARY PUBLIC FOR IDAHO
Residing at Boise ID
My Commission Expires 7-16-2010

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of February 2008, I caused a true and correct copy of the foregoing **AFFIDAVIT OF NAIDA KELLEHER** to be served by the method indicated below, and addressed to the following:

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Scott L. Campbell