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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

**AFFIDAVIT OF SCOTT L. CAMPBELL IN
SUPPORT OF PIONEER'S RESPONSE TO
UNITED STATES' MOTION TO REVISE NON-
DESTRUCT ORDER**

STATE OF IDAHO)
) ss.
County of Ada)

SCOTT L. CAMPBELL, having been duly sworn upon oath, deposes and states
as follows:

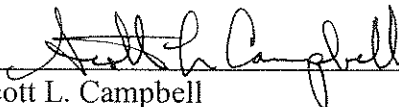
1. I am an attorney duly licensed to practice law in the state of Idaho and I
am one of the attorneys of record in the above-captioned matter for Pioneer Irrigation District
("Pioneer").

2. I have knowledge of the files pertinent to this matter and I make this affidavit based upon personal knowledge, information and belief.

3. On January 30 and 31, 2008, I participated in the deposition of Jerrold D. Gregg, in SRBA Subcase 63-3618.

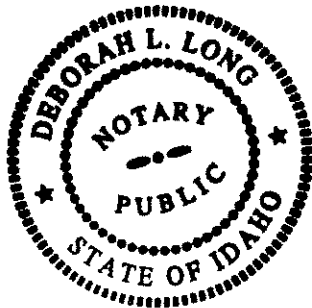
4. Relevant portions of the transcript of that deposition are attached hereto as Exhibit A.

Further your affiant sayeth naught.



Scott L. Campbell

SUBSCRIBED AND SWORN to before me this 11th day of March, 2008.

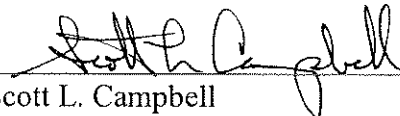




NOTARY PUBLIC FOR IDAHO
Residing at Boise, Idaho
My Commission Expires 10/10/13

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of March, 2008, I caused a true and correct copy of the foregoing **AFFIDAVIT OF SCOTT L. CAMPBELL IN SUPPORT OF PIONEER'S RESPONSE TO UNITED STATES' MOTION TO REVISE NON-DESTRUCT ORDER** to be served by U.S. Mail, postage prepaid, and addressed to the SRBA Expedited Service List.



Scott L. Campbell

EXHIBIT A

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 No. 63-3618
Case No. 39576.) (Lucky Peak Reservoir)
)
)
_____)

DEPOSITION OF JERROLD D. GREGG

Volumes I and II

(Pages 1 through 210)

Law Offices of
Moffatt, Thomas, Barrett, Rock & Fields, Chartered
101 South Capitol Boulevard, 10th Floor
Boise, Idaho 83702

Wednesday, January 30, 2008
Beginning at 1:07 o'clock p.m.;
and

Thursday, January 31, 2008
Beginning at 9:35 o'clock a.m.

QnA COURT REPORTING

Lori A. Pulsifer, CSR, RDR, CRR
Idaho Certificate No. 354
PMB 219, 111 Broadway, Suite 133
Boise, Idaho 83702-7200
E-mail: realtimeqna@msn.com
Telephone: (208) 484-6309

(ELECTRONIC COPY)

Deposition of Jerrold D. Gregg, Volumes I and II

1 A. No, I don't believe they do.

2 Q. Do you know, personally, if there are
3 documents, correspondence, or information, in written or
4 electronic form, that relates to that process of the
5 adoption of the 1985 Water Control Manual?

6 A. No, I don't. The Corps of Engineers, of
7 course, was the lead agency. I don't know if they would
8 have it in our files. Our filing system -- of course, a
9 lot of those memos have been purged from the files. We
10 have record retention policies. So I would say most of
11 them are gone now.

12 Q. Now, what do you base that upon?

13 A. Based that upon?

14 Q. Yes. You said that you would think that most
15 of those documents were purged from your files. What do
16 you base that upon? You say there is a document
17 retention policy?

18 A. We were not the lead agency. It's not like a
19 repayment contract which we have to keep permanently.
20 Unless some designation was made to keep a memo or a
21 letter, normally, after so many years, they are purged
22 from our files.

23 Q. How many years?

24 A. I don't know.

25 Q. Who would know that in your agency?

