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Attorneys for Claimant Pioneer Irrigation
District

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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. 63-02529 & 63-09109

**PIONEER IRRIGATION DISTRICT'S
SUPPLEMENTAL RESPONSES TO THE
STATE OF IDAHO'S FIRST SET OF
DISCOVERY REQUESTS**

COMES NOW the above-named claimant, Pioneer Irrigation District
("Claimant"), by and through undersigned counsel of record, and pursuant to Rules 26, 33, and
34 of the Idaho Rules of Civil Procedure, hereby submits the following supplemental responses
to the State of Idaho's first set of discovery requests.

INTERROGATORY NO. 1: Please identify the model numbers and manufacturers of the pumps and electric motors that divert water from the wells which are the points of diversion for subcase nos. 63-02529 and 63-09109.

ANSWER TO INTERROGATORY NO. 1: These two water rights involve 28 different groundwater wells. Claimant is still in the process of compiling the requested information and will timely supplement this response when it has completed its investigation. To the extent that already-existing non-privileged documents are responsive to this request, such documents will be made available for inspection at Pioneer's office located at 3084 S. Lake Avenue, Caldwell, Idaho, 83605, on a date and at a time mutually agreeable to the parties, pursuant to I.R.C.P. 33(c).

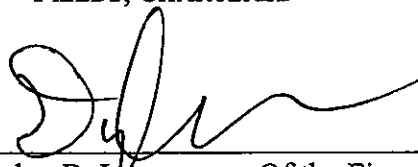
SUPPLEMENTAL ANSWER TO INTERROGATORY NO. 1:

Attached hereto as Bates No. PID000001 is a true and correct copy of correspondence from Layne of Idaho, Inc. ("Layne"), which lists the most recent information on file with Layne regarding the pumps and electric motors associated with Pioneer's groundwater wells. Please note that the wells designated as numbers 34, 51, 52, and 53 do not relate to water rights 63-2529 and 63-9109.

DATED this 27th day of January, 2009.

MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED

By



Dylan B. Lawrence – Of the Firm
Attorneys for Claimant Pioneer
Irrigation District

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of January, 2009, I caused a true and correct copy of the foregoing **PIONEER IRRIGATION DISTRICT'S SUPPLEMENTAL RESPONSES TO THE STATE OF IDAHO'S FIRST SET OF DISCOVERY REQUESTS** to be served by the method indicated below, and addressed to the following:

Representing: State of Idaho
David J. Barber
Office of the Attorney General
STATE OF IDAHO
700 West State Street, 2nd Floor
P.O. Box 83720
Boise, ID 83720-0010
Fax: (208) 854-8072

☒ U.S. Mail, Postage Prepaid
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile

Director
IDAHO DEPARTMENT OF WATER RESOURCES
P.O. Box 83720
Boise, ID 83720-0098
Fax: (208) 287-6700

☒ U.S. Mail, Postage Prepaid
☐ Hand Delivered
☐ Overnight Mail
☐ Facsimile



Dylan B. Lawrence

Layne of Idaho, Inc.

To: Mark Zirschky - Pioneer Irrigation District
 From: Steve Cook
 12-Jan-09

Current information on district wells

Motor Information**Pump (bowl assembly) information**

Well #	Well name	HP	Manufacturer	Serial #	Manufacturer	Model	Serial #
1	Sandy	15	US	151740	Layne	11 BH	5517
3	Miller	10	US	147740	Layne	12TLC	9491
4	D. Frost	15			Aurora	14RM	9492
5	A. Betts	15		147328	Layne	12TLC	
6	J. Betts	20	US	150668	Aurora	14 TXHM	9493
7	Christensen	10		123848	Worthington	14M135	9488
8	Purdum	40		2112494	Layne	14THC	T 78123
9	O. Frost	25	GE	4828350	Layne	12THC	130829
10	Ferguson	10		12F5793	Fairbanks Morse	12	AJ65379
11	Tiegs	15	US	151740	Layne	12THC	9559
12	Franklin	40		4812439	Aurora	14RH	
13	Wing	30			Layne	14THC	
14	Mason	40	US	246421	Layne-Bowler	18FXH	8645
15	Perderson	15	US	151641	Layne-Bowler	14FXHM	9556
16	Coleman	15	US	151688	Layne-Bowler	14FXHM	9557
17	Cemetery	40		125022	Johnston	18DC	9329
19	Stevens Orchard	30	AO Smith	76186	Aurora	12KHMM	7560
20	Orchard	40	GE	227029	Worthington	14HH276	6760
21	Maple Grove	40	GE	4826501	Aurora	16KHL	74891
23	Shelp	25			Goukds	14RJLO	9496
24	Lower Stevens	10	US	147746	Aurora	12KLHM	9489
25	Street	10		147744	Aurora	12KLHM	9490
26	Guinn	15		151838	Aurora	14RL	9558
34	Post	40	GE	4826857	Aurora	14RH	
40	Dickens	20	US	150136	Layne	14TLC	9489
44	Steelman	25		147104	Layne-Bowler	16PXHM	9495
46	Horton	10	GE	215454	Aurora	12KH	
51	Korn	15	US	1516A0	Layne	12TLC	
52	Johnson	50	US	28344	Layne	14THC	2405
53	Brandt	50	US	1146613	Layne	14THC	25320