

RECEIVED

MAR 19 2009

DEPARTMENT OF
WATER RESOURCES

Attorneys for Sinclair Oil Corporation d/b/a Sun
Valley Company and Newfoundland Partners LP

Scott L. Campbell, ISB No. 2251
Tara Martens, ISB No. 5773
MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED
101 S. Capitol Blvd., 10th Floor
Post Office Box 829
Boise, Idaho 83701-0829
Telephone (208) 345-2000
Facsimile (208) 385-5384
16845.0014 and 18975.0004

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. 37-12111

SINCLAIR OIL CORPORATION d/b/a SUN
VALLEY COMPANY'S ANSWERS AND
RESPONSES TO CONCERNED WATER
USERS' FIRST SET OF INTERROGATORIES,
REQUESTS FOR ADMISSION, AND
REQUESTS FOR PRODUCTION

COMES NOW Sinclair Oil Corporation d/b/a Sun Valley Company ("Sun Valley Company"), by and through undersigned counsel, and answers and responds to Concerned Water Users' First Set of Interrogatories, Requests for Admission and Requests for Production, as follows:

I.
GENERAL STATEMENTS

Sun Valley Company has not completed its investigation of the facts relating to this subcase, its discovery, nor its preparation for trial. The responses contained herein are based only upon such information and documents presently available to and known by it. Nothing contained herein shall be used to preclude Sun Valley Company from further research and investigation of the facts or from presentation of the results of that research and investigation at the time of trial.

The following responses are provided without prejudice to the right of Sun Valley Company to produce and introduce at the time of trial subsequently discovered evidence relating to the proof of presently known material facts, and to produce and introduce all evidence whenever discovered relating to the proof of subsequently discovered material facts. Moreover, because the facts and evidence now known may be imperfectly understood, or the relevancy or consequence of certain facts and evidence may be imperfectly understood, such facts and evidence in good faith may not be included in the following responses. Sun Valley Company reserves the right to refer to, conduct discovery with reference to, or offer into evidence at the time of trial, any and all documents and things notwithstanding the responses and objections interposed herein.

To the extent that a discovery request has not been objected to, Sun Valley Company has used and will use reasonable diligence to obtain information responsive to the requests responded to herein, based on examination of those files that may reasonably be expected to yield such information and interviews with those individuals reasonably expected to

have such information. All relevant and unprivileged information so obtained is contained in these responses or will be contained in supplemental responses.

To the extent Concerned Water Users seek to require Sun Valley Company to do more than the foregoing, these Interrogatories are objected to on the grounds that they would subject Sun Valley Company to oppression, harassment, and undue burden and expense not commensurate with any legitimate discovery need.

II. GENERAL OBJECTIONS

Sun Valley Company objects to the General Instructions, Instructions for Requests for Admissions, Instructions for Interrogatories, Instructions for Requests for Production (“Instructions”) and Definitions included at the beginning of this set of discovery as follows:

- (i) As applied to the specific interrogatories and requests, the “Instructions” and “Definitions” would call for information that is, in part, outside the scope of knowledge of lay individuals and may require expertise in fields beyond the scope of Sun Valley Company’s knowledge. Sun Valley Company anticipates that it will be designating expert witnesses to testify at the trial of this matter. Those experts have not yet been determined, but will be designated pursuant to the pretrial orders of this Court.
- (ii) As applied to the specific interrogatories and requests, the “Instructions” and “Definitions” would seek non-discoverable expert information which is not required to be disclosed under the Idaho Rules of Civil Procedure.
- (iii) As applied to the specific interrogatories and requests, the “Instructions” and “Definitions” would make such interrogatories and requests oppressive and burdensome, overly broad, harassing, and subject Sun Valley Company to undue expense.
- (iv) As applied to the specific interrogatories and requests, the “Instructions” and “Definitions” would make such interrogatories and requests vague and ambiguous.
- (v) As applied to the specific interrogatories and requests, the “Instructions” and “Definitions” would seek information that is subject to the attorney-client and

work-product privileges, or information that was otherwise prepared in anticipation of litigation or preparation for trial containing information, conclusions, opinions, or legal theories of attorneys.

- (vi) As applied to the specific interrogatories and requests, the “Instructions” and “Definitions” purport to impose discovery burdens on Sun Valley Company in a manner not permitted by the Idaho Rules of Civil Procedure.

III.

RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Please admit that the source of water claimed for water right no. 37-12111 was the right originally claimed as no. 37-417.

RESPONSE TO REQUEST FOR ADMISSION NO. 1: Sun Valley Company objects to this request to the extent that it is vague, ambiguous and potentially misleading. In addition, Sun Valley Company objects to this request to the extent that it calls for a legal conclusion. Without waving said objections, and subject thereto, Sun Valley Company denies this Request for Admission.

Denied.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

IV.

ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1: Please describe in detail the historical quantity of water used in the reservoir since 1937, and describe all documents relied upon to support your claim that the quantity should be recommended as 110 AFY which exceeds the 81 AFY capacity of the reservoir.

ANSWER TO INTERROGATORY NO. 1: Sun Valley Company objects to this interrogatory on the grounds it is overly broad, vague, ambiguous, burdensome and potentially

misleading. Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company further objects to this interrogatory on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, Sun Valley Company represents since 1937, the reservoir has diverted and stored sufficient volume of water in Trail Creek to maintain an artificial lake for recreation, aesthetic, and wildlife purposes.

Sun Valley Company reserves the right to supplement its answer as discovery continues and facts become known.

INTERROGATORY NO. 2: Please describe in detail the construction of the reservoir including its origins and any modifications that have been made since it was originally constructed. Include in your answer a description of the reservoir capacity since its inception and any removal of silt from the reservoir.

ANSWER TO INTERROGATORY NO. 2: Sun Valley Company objects to this interrogatory on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company further objects to this interrogatory

on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, Sun Valley Company represents the reservoir was constructed in approximately 1936; silt has been removed occasionally; and reservoir capacity is and has been at least 81 acre feet as long as the reservoir has existed.

Sun Valley Company reserves the right to supplement its answer as discovery continues and facts become known.

INTERROGATORY NO. 3: Please identify by type and location all measuring devices installed at the storage reservoir represented by water right claim no. 37-12111.

ANSWER TO INTERROGATORY NO. 3: Sun Valley Company objects to this interrogatory on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company further objects to this interrogatory on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this

interrogatory to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, Sun Valley Company represents mechanically operated discharge gates are part of the dam which diverts water in Trial Creek.

Sun Valley Company reserves the right to supplement its answer as discovery continues and facts become known.

INTERROGATORY NO. 4: Please describe in detail the basis for the remark contained in the water right report for water right no. 37-417 which states "RT. IS FOR MUNICIPAL USE WITHIN CITY OF KETCHUM; SEE FINDINGS #20 P/D NOT GIVEN IN DECREE BUT DETERMINED FROM WATERMASTER. RT. IS NOW DELIVERED TO SUN VALLEY CO. FOR IRRIG. OF ITS LANDS." Include in your answer a description of the diversion works, the lands irrigated, whether the use of this water under this right is primary or supplemental and the legal basis for the claim to use this water.

ANSWER TO INTERROGATORY NO. 4: Sun Valley Company objects to this interrogatory on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this interrogatory to the extent it is directed to parties other than Sun Valley Company. Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company further objects to this interrogatory on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as

witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, Sun Valley Company represents it has no knowledge regarding this issue.

Sun Valley Company reserves the right to supplement its answer as discovery continues and facts become known.

INTERROGATORY NO. 5: Please describe in detail the manner and/or method upon which claimant relied to determine the volume and rate of diversion claimed for storage uses claimed for water right no. 37-12111.

ANSWER TO INTERROGATORY NO. 5: Sun Valley Company objects to this interrogatory on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company further objects to this interrogatory on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, Sun

Valley Company represents it will provide responsive information in conformance with Idaho Rule of Civil Procedure 26(b)(4) and applicable orders of the Court.

Sun Valley Company reserves the right to supplement its answer as discovery continues and facts become known.

INTERROGATORY NO. 6: Please identify any person or entity which you have retained to undertake an expert analysis of the (sic) any of the matters at issue in this SRBA subcase, and indicate the subject of the expert's study and analysis and whether the expert is expected to produce a report and testify at the trial of this matter.

ANSWER TO INTERROGATORY NO. 6: Sun Valley Company objects to this interrogatory to the extent its scope exceeds the provisions of the Idaho Rules of Civil Procedure applicable to disclosure of expert witnesses. Sun Valley Company further objects to this interrogatory on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this interrogatory to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation.

Without waiving said objections, and subject thereto, Sun Valley Company has not made any final determination as to who will be called as expert witnesses at the trial of this action. At such time as a determination is made relative to expert witnesses, this Answer will be

supplemented accordingly. Further, Sun Valley Company anticipates compliance with the pretrial Orders of the Court relative to disclosure of witnesses.

Sun Valley Company reserves the right to supplement its answer as discovery continues and facts become known.

V.

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: Please produce all records of diversion and/or delivery of water, for water diverted under water right no. 37-12111 from 1937 to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Sun Valley Company objects to this request on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this request to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company objects to this request on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this request to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, Sun Valley Company represents it has no responsive documents.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

REQUEST FOR PRODUCTION NO. 2: Please produce all reports, correspondence, photographs, memoranda, and all other documents relied upon by claimant or its agents to respond to the requests for admission and interrogatories served contemporaneously herewith, excluding those documents which claimant contends are protected by a privilege.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: Sun Valley Company objects to this request on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this request to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company objects to this request on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this request to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, *see* Attachment A.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

REQUEST FOR PRODUCTION NO. 3: Please produce all aerial photographs, maps and other depictions in the possession of claimant depicting the place of use for water right no. 37-12111.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: Sun Valley Company

objects to this request on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this request to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company objects to this request on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this request to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, *see* Attachment A.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

REQUEST FOR PRODUCTION NO. 4: Please produce all records associated with any use of water under water right no 37-417 by Sun Valley Company.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: Sun Valley Company objects to this request on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this request to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company objects to this request on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with

Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this request to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation. Without waiving said objections, and subject thereto, Sun Valley Company represents it has no responsive documents.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

REQUEST FOR PRODUCTION NO. 5: Please produce all records which indicate the rate and volume of transmission and/or conveyance loss for all locations within the place of use for water right no. 37-12111.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Sun Valley Company objects to this request on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this request to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company objects to this request on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this request to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of

litigation. Without waiving said objections, and subject thereto, Sun Valley Company represents it has no responsive documents.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

REQUEST FOR PRODUCTION NO. 6: Please produce all correspondence, documents and other records upon which the claimant relied or upon which claimant based its objections represented in the Notice of Error Reply sent to the Idaho Department of Water Resources for water right nos. (sic) 37-12111.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Sun Valley Company objects to this request on the grounds it is overly broad, vague, ambiguous, burdensome and potentially misleading. Sun Valley Company objects to this request to the extent it seeks the disclosure of impeachment evidence. Sun Valley Company objects to this request on the basis of and to the extent it seeks the identity of and disclosure of facts known or opinions held by experts who have been retained or specially employed by it in anticipation of litigation or in preparation for trial and who are not expected to be called as witnesses at trial in accordance with Idaho Rule of Civil Procedure 26(b)(4)(B). Sun Valley Company objects to this request to the extent it seeks the disclosure of individuals merely contacted or consulted by it and who will not be retained as expert witnesses, and to the extent it seeks the disclosure of information protected by the attorney/client and/or work product privileges, or information prepared in anticipation of litigation.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

REQUEST FOR PRODUCTION NO. 7: Please produce any expert reports generated in response to, or for the purpose of resolving any matter at issue in SRBA subcase no. 37-12111.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: See Answer to Interrogatory No. 6, and objections thereto.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

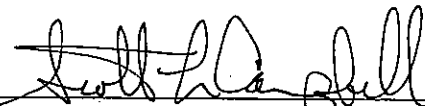
REQUEST FOR PRODUCTION NO. 8: For any documents withheld from production under a claim of privilege, please produce a privilege log in conformance with Idaho Rule of Civil Procedure 26(b)(5)(A).

RESPONSE TO REQUEST FOR PRODUCTION NO. 8: Sun Valley Company is preparing a privilege log in conformance with Idaho Rule of Civil Procedure 26(b)(5)(A) and will provide it upon completion.

Sun Valley Company reserves the right to supplement its response as discovery continues and facts become known.

DATED this 17th day of March, 2009.

MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED

By 
Scott L. Campbell – Of the Firm
Attorneys for Sinclair Oil Corporation
d/b/a Sun Valley Company

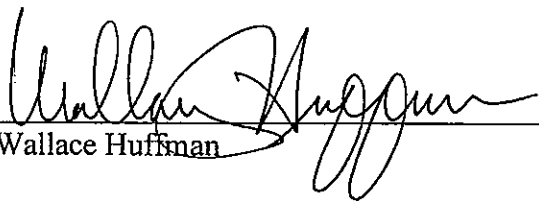
**VERIFICATION OF SINCLAIR OIL CORPORATION d/b/a SUN VALLEY
COMPANY'S ANSWERS AND RESPONSES TO CONCERNED WATER USERS'
FIRST SET OF INTERROGATORIES, REQUESTS FOR ADMISSION, AND
REQUESTS FOR PRODUCTION**

STATE OF IDAHO)
) ss.
County of Blaine)

WALLACE HUFFMAN , being duly sworn, deposes and says:

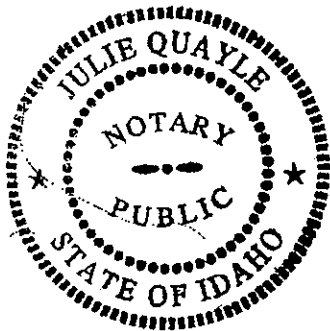
He is a VICE PRESIDENT AND GENERAL MANAGER of SUN VALLEY COMPANY,
the corporation named in the above-entitled proceeding and is authorized to make this
verification in its behalf.

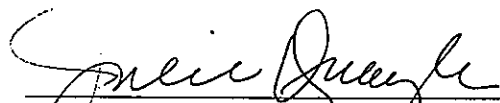
He has read the foregoing SINCLAIR OIL CORPORATION d/b/a SUN VALLEY
COMPANY'S ANSWERS AND RESPONSES TO CONCERNED WATER USERS' FIRST SET OF
INTERROGATORIES, REQUESTS FOR ADMISSION, AND REQUESTS FOR PRODUCTION, knows
the contents thereof, and the same are true to the best of her knowledge, information, and belief.



Wallace Huffman

SUBSCRIBED AND SWORN to before me this 16 day of March, 2009.





NOTARY PUBLIC FOR IDAHO
Residing at Blaine County
My Commission Expires 11-1-2011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of March, 2009, I caused a true and correct copy of the foregoing SINCLAIR OIL CORPORATION d/b/a SUN VALLEY COMPANY'S ANSWERS AND RESPONSES TO CONCERNED WATER USERS' FIRST SET OF INTERROGATORIES, REQUESTS FOR ADMISSION, AND REQUESTS FOR PRODUCTION to be served by the method indicated below, and addressed to the following:

*Representing: Bill Molyneux, Gerald Bashaw,
Grace Eakin, John F. Stevenson, Pepin Corso-
Harris, Pete Van Der Muelen, and Tom O'Gara*
Albert P Barker
BARKER RSHOLT & SIMPSON
1010 W Jefferson, Suite 102
P.O. Box 2139
Boise, ID 83701-2139
Fax (208) 344-6034

(X) U.S. Mail, Postage Prepaid
() Hand Delivered
() Overnight Mail
() Facsimile

Craig D. Hobdey
125 5th Ave W
P.O. Box 176
Gooding, ID 83330
Fax: (208) 934-4420
Representing: Big Wood Canal Company

(X) U.S. Mail, Postage Prepaid
() Hand Delivered
() Overnight Mail
() Facsimile

James P. Speck
SPECK & AANESTAD
120 East Avenue
P.O. Box 987
Ketchum, ID 83340
Fax: (208) 726-0752
*Representing: Black Butte Hills LLC,
Diamond/Soldier Properties LLC, Smokey
Dome LLC, SV Ranch LLC, Twin Lakes
Reservoir & Irrigation*

(X) U.S. Mail, Postage Prepaid
() Hand Delivered
() Overnight Mail
() Facsimile

Michael C. Creamer
GIVENS PURSLEY LLP
601 W. Bannock Street
P.O. Box 2720
Boise, ID 83701-2720
Fax: (208) 388-1300
*Representing: Dana Dowers and The Valley
Club*

(X) U.S. Mail, Postage Prepaid
() Hand Delivered
() Overnight Mail
() Facsimile

Michael P. Lawrence
GIVENS PURSLEY LLP
601 W. Bannock Street
P.O. Box 2720
Boise, ID 83701-2720
Fax: (208) 388-1300
Representing: Victor M. Smith

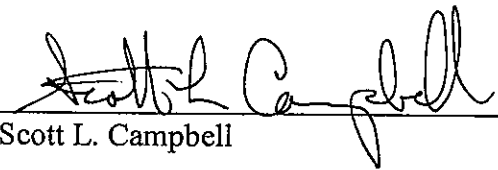
☒ (X) U.S. Mail, Postage Prepaid
☐ () Hand Delivered
☐ () Overnight Mail
☐ () Facsimile

UNITED STATES DEPARTMENT OF JUSTICE
Environment & Natural Resources
MSC 033
550 West Fort Street
Boise, ID 83724
Fax: (208) 334-1414
*Representing: United States of America and
USDI Bureau of Reclamation*

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

Director
IDAHO DEPARTMENT OF WATER RESOURCES
322 E. Front Street, 6th Floor
P.O. Box 83720
Boise, ID 83720
Fax: (208) 287-6700

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



Scott L. Campbell