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DEPARTMENT OF  
WATER RESOURCES

Attorneys for Objector  
Pioneer Irrigation District

Scott L. Campbell, ISB No. 2251  
Dylan B. Lawrence, ISB No. 7136  
MOFFATT, THOMAS, BARRETT, ROCK &  
FIELDS, CHARTERED  
101 S. Capitol Blvd., 10th Floor  
Post Office Box 829  
Boise, Idaho 83701  
Telephone (208) 345-2000  
Facsimile (208) 385-5384  
18946.0137

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. 63-00179C

**SECOND NOTICE OF RULE 30(b)(6)  
DEPOSITION OF THE IDAHO DEPARTMENT  
OF WATER RESOURCES**

PLEASE TAKE NOTICE that Objector Pioneer Irrigation District hereby notices, pursuant to Idaho Rule of Civil Procedure 30(b)(6) and Idaho Rule of Evidence 706(a), a deposition of the Idaho Department of Water Resources ("IDWR"), before an officer authorized to administer oaths on Monday, December 12, 2011, at 10:00 a.m., and continuing thereafter from day to day until completed, at the offices of MOFFATT, THOMAS, BARRETT, ROCK & FIELDS,

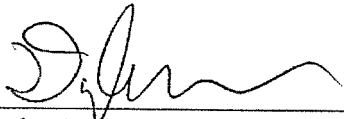
CHARTERED, located at 101 S. Capitol Blvd., 10th Floor, Boise, Idaho, at which time and place you are notified to appear and take such part in the examination as you may deem proper.

Pursuant to Idaho Rule of Civil Procedure 30(b)(6), IDWR has a duty to designate one or more knowledgeable representatives to testify on its behalf at this deposition. Specifically, examination is requested on the factual and legal bases for IDWR's recent Supplemental Director's Report regarding injury and enlargement issues in the above-referenced subcase, including the steps taken, investigations undertaken, documents relied upon and policies followed in the preparation of that document.

This deposition shall take place pursuant to the Idaho Rules of Civil Procedure.

DATED this 5 day of December, 2011.

MOFFATT, THOMAS, BARRETT, ROCK &  
FIELDS, CHARTERED

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

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5 day of December, 2011, I caused a true and correct copy of the foregoing **SECOND NOTICE OF RULE 30(b)(6) DEPOSITION OF THE IDAHO DEPARTMENT OF WATER RESOURCES** to be served by the method indicated below, and addressed to the following:

Idaho Department Of Water Resources  
322 E. Front Street  
Boise, Idaho 83720-0098

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

Director  
IDAHO DEPARTMENT OF WATER RESOURCES  
P.O. Box 83720  
Boise, ID 83720-0098

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

Mason Creek Ditch Co.  
Represented by:  
Albert P. Barker  
1010 W. Jefferson, Ste. 102  
P.O. Box 2139  
Boise, ID 83701-2139

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

Martin Galvin  
P.O. Box 115  
Middleton, ID 83644

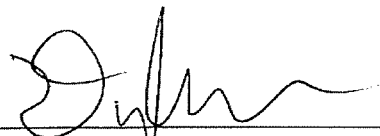
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John J. McEvoy  
1703 N. KCID Rd.  
Caldwell, ID 83605

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☐ Overnight Mail  
☐ Facsimile

Jeana Reiner  
QNA COURT REPORTING  
PMB 219  
776 East Riverside Drive, Suite 200  
Eagle, Idaho 83616  
Fax: (208) 286-7426  
E-mail: [depos@qnacourtreporting.com](mailto:depos@qnacourtreporting.com)

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☒ Email

  
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Dylan B. Lawrence

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Pioneer Irrigation District

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In Re SRBA  
Case No. 39576

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**SECOND NOTICE OF SERVICE FOR RULE  
30(b)(6) DEPOSITION OF THE IDAHO  
DEPARTMENT OF WATER RESOURCES**

I HEREBY CERTIFY that on this 5<sup>th</sup> day of December, 2011, I caused a true  
and correct copy of the **SECOND NOTICE OF RULE 30(b)(6) DEPOSITION OF THE IDAHO  
DEPARTMENT OF WATER RESOURCES** and the foregoing **NOTICE OF SERVICE** to be served by  
the method indicated below, and addressed to the following:

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322 E. Front Street  
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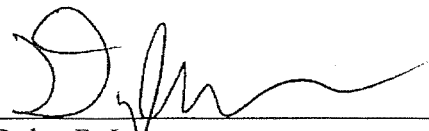
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