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ATTORNEYS FOR THE IDAHO  
DEPARTMENT OF WATER RESOURCES

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 Nos. 36-00134A and |
|                | ) | 36-00135B                  |
| Case No. 39576 | ) |                            |
|                | ) | IDWR'S WITNESS AND         |
|                | ) | EXHIBIT LISTS              |
|                | ) |                            |

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Descriptive Summary

Pursuant to request by Special Master Dolan, this document is IDWR's witness and exhibit lists for subcase nos. 36-00134A and 36-00135B.

POTENTIAL WITNESSES

IDWR does not yet know if it will call any witnesses at trial.  
Potential witnesses include the following individuals:

Steve Clelland: Idaho Department of Water Resources, 222 Shoshone St. East, Twin Falls, ID 83301. (208) 736-3033.  
All aspects of examination and recommendation of the water rights including field examination.

Helen Harrington-Thornton, Idaho Department of Water Resources, 1301 N. Orchard, Boise, ID 83706. (208) 327-7900.  
Basis for recommendation of the water rights including field examination and error correction review.

One or more of the following people may called to testify as an expert:

Jeff Peppersack/David Shaw, Idaho Department of Water Resources, 1301 N. Orchard, Boise, ID 83706. (208) 327-7900.

May testify as to the Department's procedures and methodology for determining acreage, diversion rate, season of use, and any other disputed elements of these water rights.

Marci Sterling, Idaho Department of Water Resources, 1301 N. Orchard, Boise, ID 83706. (208) 327-7900.

May testify as to IDWR's procedures for determining irrigated acreage. May also testify about notice of error procedure.

IDWR will supplement this list if necessary as issues are further defined

#### POTENTIAL EXHIBITS

IDWR has not yet determined if it will present any trial exhibits. Among those which it may use are the following:

Notice of Claim.

Notice of Error.

Claim File.

Depositions.

Allen & Brockway report (1983).

SCS soils data and map.

"Irrigation Water Requirements," SCS Publication No. 21 (1970).

"Design and Operation of Farm Irrigation Systems," M.E. Jensen (1983).

Memorandum from Jeff Peppersack on "Reference Maps for Consumptive Irrigation Requirement, Irrigation Field Headgate Requirement, and Irrigation Season of Use"

"Spring and Fall Freezing temperature and Growing Seasons in Idaho" by Dale Everson, Maurice Faubion and Deborah E. Amos

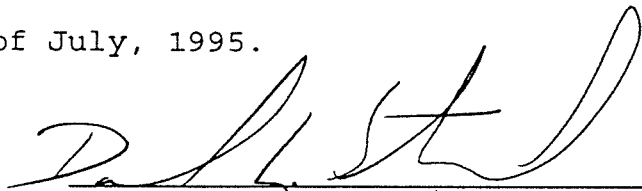
New International Mortgage Bank v. Idaho Power Company Decree and Stipulation, Equity No. 1602 (D.S. Id. 1932).

Guidelines for the Evaluation of Irrigation Diversion Rates (the Hubble Engineering Report).

"World Maps of Potential Evapotranspiration, Plant Development, and Spring Greening and Autumn Browning of Vegetation, Based on the Solar Thermal Unit Model" by Montana Agricultural Experiment Station.

"Irrigation Diversion Requirement Analysis," Jeff Peppersack (1995).

DATED this 17<sup>th</sup> day of July, 1995.



NICHOLAS B. SPENCER/DANIEL L. STECKEL  
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Idaho Department of Water Resources