

RECEIVED

MAY 3 1 1996

Department of Water Resources
Adjudication Bureau

COPY

Claimant:

Hagerman Water Right Owners, Inc. and
its individual members

Attorney Name and Address:

HEPWORTH, LEZAMIZ & HOHNHORST,
CHARTERED
133 Shoshone St. North
P.O. Box 389
Twin Falls, ID 83303-0389
Telephone: (208)734-7510

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. See Attached Exhibit A

)

Case No. 39576

)

AFFIDAVIT OF JOHN W. JONES, JR.

)

* * * * *

STATE OF IDAHO

)

) ss.

County of Twin Falls

)

John W. Jones, Jr., being first duly sworn upon oath, deposes and says:

1. Your affiants name is John W. Jones, Jr. (Bill Jones). I reside at 1106-C
East 2900 South, Hagerman, Idaho 83332. I am submitting this affidavit in support of the
motions for summary judgment that have been filed in the above entitled matter. I further

1 state that the matters set forth herein are based upon my personal information and
2 knowledge, and experience based upon my lifetime of farming in the Hagerman Valley,
3 Idaho.

4 2. I was born and raised in the Hagerman Valley, and I have been
5 involved in irrigated farming my entire adult life. I raise a variety of crops in the Hagerman
6 Valley, including irrigated alfalfa hay. I am familiar with farming practices throughout
7 southern Idaho, and in particular I am familiar with the irrigated farming practices employed
8 in the Hagerman Valley. This experience includes 50 years of raising irrigated crops,
9 including alfalfa hay. Based upon that experience, I am familiar with the irrigation crop
10 needs and practices employed in the Hagerman Valley area in raising irrigated alfalfa hay.

11 3. While yields will depend upon soil and weather conditions, assuming
12 good farming practices, proper water rotation and other farming practices, I have been able
13 to raise 9 to 10 tons of alfalfa hay per acre per year on our ranch. While the above stated
14 figure is an average figure, my actual yields can vary plus or minus 5% in any year, it has
15 been my experience, year in and year out, over the past 50 years that a 9 to 10 ton per acre
16 average of hay is a reasonable yield to expect of Hagerman Valley, if proper crop rotation
17 and water practices are utilized. It takes a lot of water on our sandy soil to raise alfalfa hay
18 in order to keep the soil wet to maximize yields. In addition to watering the hay before the
19 first cutting, it is necessary for our pivot irrigation system to run almost continuously
20 between the first and second cuttings, and it definitely runs almost steadily between the
21 remaining cuttings of alfalfa hay. If the water is properly utilized, and the crop is kept
22 properly wet as is required in our area because of our climatic and soil conditions, yields
23

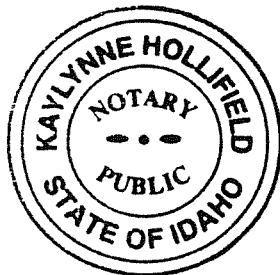
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

in the Hagerman Valley area for irrigated hay average between 9 and 10 tons per acre per year.

Dated this 31st day of May, 1996.

John W. Jones
John W. Jones, Jr.

SUBSCRIBED and SWORN to before me this 31st day of May, 1996.



[Signature]
NOTARY PUBLIC FOR IDAHO
Residing at: _____
My Commission Expires: 10/1/2001

EXHIBIT "A"

List of Subcases

Lynn J. Babington and Karen L. Babington	36-00003C
Walter J. Bonning, II and Judy L. Bonning	36-00108B
Dale E. Boyer and Elaine Boyer	36-00079
William E. Norris, David L. and Linda C. Cropper, Blaine Richard and Vivian Cropper, Dave and Nancy Anderson	36-00047
Mildred Culbertson	36-10409
Frank C. Erwin and Peggy Erwin	36-00092
Michael J. Fleming	36-00064B
Keith L. Fuell and Jolene Fuell	36-00086C
Frank L. Glauner and Jean Glauner	36-00039E
Mattie P. Grigg	36-10283B
George J. Korbis and Nellie W. Korbis	36-00039N
Marilyn J. Miller	36-00085A
Howard L. Morris and Rhonda K. Morris	36-00061
Howard L. Morris and Rhonda K. Morris	36-00062
Howard L. Morris and Rhonda K. Morris	36-00063
Mark Potter and Susan Potter	36-00039J
Edna M. Rea	36-00003A
Roger Shaffer	36-00034B
Doyt H. Simcoe and Roxie Simcoe	36-00003F
Richard D. Simon	36-00035J
Dick J. Veenendaal and Sigrid E. Veenendaal	36-00039C
Edith L. Vernon	36-00003E
Paul E. Watkins and Inez S. Watkins	36-00106
Basil Lester Zink and Myrle Hyde Zink	36-00103F