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RECEIVED

JUN 27 2014

DEPARTMENT OF
WATER RESOURCES

Attorneys for Shanna Foster and Jennifer Ayers

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT FOR THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA

Subcase Nos. 74-1615 & 74-2351

Case No. 39576

AFFIDAVIT OF ROXANNE BROWN

STATE OF IDAHO)
) ss.
County of Ada)

ROXANNE BROWN, being first duly sworn upon oath, deposes and says:

1. I am over the age of 18 and state the following based upon my own personal knowledge.
2. I was an employee of the Idaho Department of Water Resources ("IDWR") for an 18-year period from 1988 to 2006. During that period, I reviewed more than 10,000 claims in the Snake River Basin adjudication and had primary responsibility for the review and recommendation of the claims in Basin 74 (the Lemhi River Drainage).
3. I joined SPF Water Engineering in September 2006 as a Senior Water Right Specialist. I continue to work on general water right reviews and analysis, but specialize in

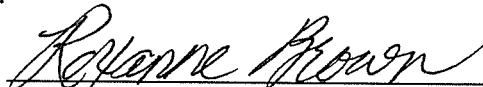
complicated water right issues, including master planning, water right valuation, protest and objection resolution and litigation support.

4. Prior to second round service for Basin 74, IDWR staff reviewed imagery and prepared GIS shapes for each point of diversion and place of use described in the final Lemhi Basin decree. Although 1987 infrared photography was used in most areas of Idaho for review, that photography was not available for the Lemhi Valley. Because infrared imagery was not available, 1993-94 true color photography was obtained from the USDI-Bureau of Land Management and used for the Basin 74 review.

5. Attached hereto as Exhibit A is a map of the general place of use for the above-captioned subcases as described in the Lemhi decree. The place of use is shown on true color imagery used by IDWR staff to prepare maps prior to second round service in the SRBA. Based on my review of Exhibit A, the place of use for the above-captioned subcases appears irrigated, and shapes could easily have been prepared for water right nos. 74-1615 and 74-2351.

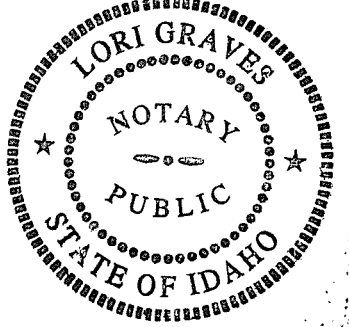
Further your Affiant sayeth naught.

DATED this 18TH day of June, 2014.



ROXANNE BROWN

SUBSCRIBED AND SWORN TO BEFORE ME this 18 day of June, 2014.





NOTARY PUBLIC for Idaho
Residing at: Bow
My Commission Expires: 5/6/2015

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of June 2014, I caused the following documents to be filed with the Court: *Notice of Service, Notice of Hearing; Motion to Set Aside and Memorandum in Support; Affidavit of Chris M. Bromley; Affidavit of Shanna Foster; Affidavit of Thomas C. Udy; Affidavit of Carter Fritschle; Affidavit of Roxanne Brown; Motions for Late Claims; Memorandum in Support of Motions for Late Claim; Notices of Claim.* As attested to in the *Notice of Service*, the foregoing documents were filed with the Court and true and correct copies served on the SRBA's Expedited Mailing List and water users on Everson Creek, Lee Creek, and Stroud Creek.


CHRIS M. BROMLEY
Attorneys for Shanna Foster and Jennifer Ayers

