

OCT 30 2020

WATER RESOURCES  
WESTERN REGION

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*Attorneys for Big Willow Ranch, LLC*

BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO

IN THE MATTER OF APPLICATION  
FOR PERMIT NO. 65-23867 IN THE  
NAME OF BIG WILLOW RANCH, LLC

NOTICE OF SERVICE OF  
APPLICANT'S INITIAL EXPERT  
WITNESS STATEMENTS AND  
OPINIONS

Applicant Big Willow Ranch, LLC ("Applicant"), through its attorneys Givens Pursley LLP, pursuant to the Hearing Officer's *Notice of Hearing and Scheduling Order* dated September 18, 2020 ("*Scheduling Order*"), and pursuant to Idaho Department of Water Resources Rule of Procedure 520.02 (IDAPA 37..01.01.520.02) and Idaho Rule of Civil Procedure 26(b)(4)(A), hereby provides notice that on October 30, 2020 the following expert witness statements and opinions were filed with the Hearing Officer and served upon the parties to the above-captioned matter:

1. Declaration of Terry Scanlan, P.E., P.G., dated October 30, 2020; and
2. Declaration of Ron Shurtleff, Watermaster, Water District No. 65, dated October 29, 2020.

Mr. Scanlan is a retained expert disclosed under Idaho Rule of Civil Procedure 26(b)(4)(A)(i). Mr. Shurtleff is a non-retained expert disclosed under Idaho Rule of Civil Procedure 26(b)(4)(A)(ii).

Exhibits that may be used as a summary of or support for Mr. Scanlan's and Mr. Shurtleff's statements and opinions will be filed and served in accordance with the *Scheduling Order*.

DATED this 30th day of October, 2020.

GIVENS PURSLEY LLP



---

Michael P. Lawrence  
*Attorneys for Big Willow Ranch, LLC*

## CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of October, 2020, a true and correct copy of the foregoing was filed and/or served upon the following individual(s) by the means indicated:

### DOCUMENT FILED:

Nick Miller  
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**NOTICE OF SERVICE OF APPLICANT'S  
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BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO

IN THE MATTER OF APPLICATION  
FOR PERMIT NO. 65-23867 IN THE  
NAME OF BIG WILLOW RANCH, LLC

DECLARATION OF TERRY  
SCANLAN, P.E., P.G.

I, TERRY SCANLAN, declare:

1. I am over the age of eighteen and the facts and opinions stated below are based on my personal knowledge and experience, and if called as a witness I would and could truthfully testify thereto. I make this declaration pursuant to Idaho Code Section 9-1406.

2. I prepared the memorandum dated September 1, 2020, regarding the "Analysis of Water Availability to Support Application for Permit 65-23867," which was filed with the Idaho Department of Water Resources and served upon the parties in the above-captioned matter as Exhibit A to the September 1, 2020, letter from Michael P. Lawrence disclosing "Rule 40" information ("Rule 40 Information"). Section II of the Rule 40 Information and my memorandum included with the Rule 40 Information as Exhibit A constitute my initial expert report in the above-captioned matter ("Expert Report"), and are incorporated herein by reference. This declaration, the Rule 40 Information, and the Expert Report contain the statements of opinions I intend to express at the hearing in this matter and the basis and reasons for those opinions. The data and other information I considered are contained in the Expert Report. I may also testify to other factual or technical issues concerning Application

for Permit No. 65-23867 raised by the Idaho Department of Water Resources or another party.

3. It is my expert opinion that the proposed diversion and use of water under Application for Permit No. 65-23867 will not reduce the quantity of water under existing water rights, will not conflict with the local public interest as defined in section 42-202B, Idaho Code, and is not contrary to conservation of water resources within the state of Idaho.

4. In addition, it is my expert opinion that the water supply is sufficient for the purpose for which it is sought to be appropriated under Application for Permit No. 65-23867.

5. A true and correct copy of my curriculum vitae is attached to this declaration as Exhibit A.

6. I have not authored any publications in the past ten years.

7. I am being compensated at an hourly rate of \$180 for my testimony in this matter.

8. I have not testified as an expert in any court trials in the last four years, but have testified as an expert in administrative hearings regarding application for permit no. 63-34348 (Elmore County), transfer applications no. 80342 and 81800 (Casa Del Norte), and application for permit nos. 63-34079 and 63-34080 (Emmert). I also have provided expert deposition testimony concerning application for permit no. 63-34348 (Elmore County) and transfer application no 81800 (Casa Del Norte).

9. I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

DATED this 30th day of October, 2020.

*Terry M. Scanlan*  
\_\_\_\_\_  
TERRY SCANLAN, P.E., P.G.

## **EXHIBIT A**

Principal Engineer and Hydrogeologist

Terry M. Scanlan, P.E., P.G.



### **Education**

M.S., Geological Engineering, University of Idaho, 1986

B.S., Geological Engineering, University of Idaho, 1983

### **Professional Certification**

Professional Engineer  
Idaho No. 6266, 1990  
Nevada No. 22016, 2012

Professional Geologist  
Idaho No. 646, 1989  
Oregon No. G1311, 1992

Certified Water Right Examiner  
Idaho No. 129

### **Areas of Expertise**

- Groundwater development studies
- Water rights
- Design, installation, and testing of high-capacity wells for irrigation, municipal, and industrial water supply

### **Experience Summary**

Mr. Scanlan has over 30 years of professional experience in water supply consulting as an engineer and hydrogeologist. He has particular expertise in water rights, well and pumping system design, public drinking water systems, irrigation, and other water resource matters. Mr. Scanlan also has experience in geothermal resource development, mining-related environmental studies, dewatering, soils investigations, geologic mapping, and wastewater land application projects. He has served as Chairman of the Idaho Board of Registration for Professional Geologists. Mr. Scanlan is a Certified Water Right Examiner in Idaho.

### **SPF Water Engineering – 2004 to present**

Mr. Scanlan is a Principal Engineer and Hydrogeologist with SPF Water Engineering, LLC. SPF Water Engineering, LLC, was formed from Scanlan Engineering in March 2004 to provide a wider range of water resource engineering services.

### **Scanlan Engineering–1994 to 2004**

Mr. Scanlan formed Scanlan Engineering in 1994 to provide engineering and hydrogeologic consulting to public and private clients. Scanlan Engineering provided water resource consulting services to more than 300 clients, primarily in southwest Idaho. Mr. Scanlan also served as a subconsultant on water supply projects for numerous engineering firms in Idaho.

### **Montgomery Watson–1986 to 1993**

Prior to forming Scanlan Engineering in 1994, Mr. Scanlan worked as a supervising hydrogeologist for Montgomery Watson (MWH) in Boise, Idaho. He managed and conducted ground-water development projects and hydrogeologic investigation throughout the western United States.

### **U.S. Geological Survey–1984 to 1986**

Mr. Scanlan was employed by the U.S. Geological Survey as a field assistant in the geologic division prior to joining Montgomery Watson in 1986. Responsibilities included geologic mapping, landslide hazard evaluation, and mineral potential studies. Mr. Scanlan worked on the Challis and Hailey 2<sup>1/2</sup> Quadrangle CUSMAP programs.

### **Relevant Water Supply Project Experience**

- **Industrial Water Supply Wells.** Design, construction monitoring, and testing of four 1,000- to 1,200-foot, high-capacity, industrial water supply wells and pump systems for Micron Technology in Boise, Idaho. Construction of supply wells for Sorrento Lactalis in Nampa, Idaho, CTI Foods in Wilder,

Idaho, Champion Homes in Weiser, Idaho, Tamarack Energy in Tamarack, Idaho, and CS Beef Packers in Nampa, Idaho.

- **Public Drinking Water Wells.** Design and testing for approximately 200 public drinking water supply wells. Clients include United Water Idaho, North Lake Recreational Sewer & Water District, the cities of Nampa, Boise, Meridian, Eagle, Middleton, Homedale, Greenleaf, Garden City, and Marsing, and numerous subdivisions, industries, churches, camps, and commercial facilities.
- **Fish Hatchery Water Supply.** Design, construction, testing, and equipping of two hatchery supply wells at the Sawtooth National Fish Hatchery. The work also included preparation of water right permit and transfer applications, and completion of a water right beneficial use field examination that resulted in licensing of an additional water right for the facility. Design, construction, and testing of three hatchery water supply and one domestic water supply wells at the Idaho Dept. of Fish and Game Springfield Hatchery. The work also included equipping of seven wells, aquifer testing, and water right permitting. Groundwater supply investigation, well rehabilitation, and pump design at the Kooskia National Fish Hatchery. Design, construction and testing of two hatchery water supply wells at the Idaho Power Company Upper Pahsimeroi Fish Hatchery near May, Idaho. Groundwater supply and water right investigation to support water supply improvements for the Lahontan National Fish Hatchery near Gardnerville, Nevada. Test well and production well construction for the Mason Valley Fish Hatchery near Yerington, Nevada.
- **Heating and Cooling Well Systems.** Design, construction monitoring, and testing of production and injection well systems for heating and cooling purposes at Idaho Water Center (Boise), Whitney Elementary School (Boise), and the Oregon National Guard Ontario Readiness Center.
- **Aquifer Storage and Recovery (ASR).** Lead consultant to Micron Technology for the Boise River water supply and aquifer recharge project, including water rights, a nominal 25,000 gpm Boise River pump station, 3 miles of 24-inch and 30-inch pipeline, an ultra-filtration membrane water treatment system, and a nominal 4 MGD injection well. Mr. Scanlan has provided design and permitting for ASR at Capitol Water Corporation Well No. 6.
- **Park Irrigation.** Mr. Scanlan has been responsible for design and construction of more than 30 new well and surface water pumping systems at municipal parks in Boise, Idaho. He provides annual evaluations of nearly 100 well and surface-water pump systems for the Boise Park Department.
- **Pressurized Irrigation.** Efficiency and operation evaluation of the City of Nampa pressurized irrigation system, which includes 92 pump stations and wells. Trouble-shooting and water-right evaluation for Harris Ranch Subdivision, Mallard Landing Subdivision, and Surprise Valley Subdivision. Usage monitoring at Surprise Valley Subdivision. Design and construction of pump stations and wells, including CenterCal and Meridian CrossRoads shopping centers, Boise LDS Temple, and numerous private subdivision systems.
- **Municipal Drinking Water Well Pumps.** Design, permitting, and construction inspection of well pump systems and well houses for Capitol Water Corporation in Boise, Idaho.
- **Aquarium Water Supply.** Design, construction, and testing of salt water production wells for large-scale aquarium projects in Guam and Taiwan.
- **Ski-Area Water Supply.** Evaluation of ground water potential for snowmaking or potable supplies at Sun Valley, Brundage, and Bogus Basin ski areas. Design and testing of the water supply well for the snowmaking system at Sun Valley. Exploration drilling at Brundage Mountain.
- **Infiltration Galleries.** Evaluation and testing of infiltration galleries and Ranney Collectors at Sequim, Washington (horizontal gallery, Dungeness River), Irrigon, Oregon (four Ranney Collectors, Columbia River), Boise, Idaho (three Ranney Collectors, Boise River), and Modesto, California (Tuolumne River, horizontal gallery).
- **Mining Water Supply.** Design of the domestic supply, mine-pit dewatering, and industrial supply wells for the Beartrack mining project at Leesburg, Idaho.
- **Agricultural Water Supply.** Water master planning for the 3600-acre City of Boise Twenty Mile South Farm, that included reconfiguration of water rights, development of additional irrigated lands, design of two large-capacity irrigation wells, design of a 500-hp and 400-hp variable speed deep well turbine pump systems, and efficiency evaluations of 12 irrigation wells. Piping, pump, and well evaluations for pressurized irrigation systems serving farms in Idaho, Oregon, and California. Pump design for dozens of irrigation systems





throughout southern Idaho.

- **Groundwater Exploration.** Construction and testing of ten water-supply exploration wells for SunCor in northern Ada County, Idaho. Multi-level water quality exploration wells for the cities of Meridian and Nampa. Blaine County airport water supply study exploration well. Crater Lake National Park water supply exploration well.
- **Energy Water Supply.** Water supply studies for proposed nuclear power plants for Mid-American Nuclear Energy and Alternate Energy Holdings, including conceptual water supply design, water rights, consulting, and baseline environmental studies.
- **Regional Water Supply.** Surface water and groundwater studies for the proposed Elmore-Ada Water Project in southwest, Idaho. Groundwater supply studies for the NAWS project in North Dakota. Water supply studies for Elmore County, including conceptual design and water-right permitting for pumping systems and pipelines extending to Mountain Home, Idaho, from the Snake River and from the South Fork Boise River.

#### Water Rights

- **Applications.** Preparation of hundreds of water right applications (transfers, amendments, permits, claims) for public and private clients in Idaho.
- **Beneficial Use Examinations.** Preparation of beneficial use examinations required for licensing of more than 100 water right permits. Work includes measurement of diversion rate, determination of place of use boundaries, documentations of diversion facilities, and recommendations for diversion rates, volumes, uses, and seasons based on state licensing criteria.
- **Hydrogeologic Studies.** Evaluation of surface water and ground water interactions, well interference, irrigation development, and consumptive water use related to water right transfers in the Boise Valley, Wood River Valley, Mud Lake, Magic Valley, Big Lost River, and Little Lost River areas of Idaho.
- **Springs.** Evaluation and measurement of flow from springs involved in water right disputes along the Snake River near Twin Falls and Hagerman, Idaho. Development of mitigation alternatives for spring-flow declines near Buhl, Idaho.
- **Irrigation Rate Studies.** Investigations related to Snake River Basin Adjudication claims, including calculation of irrigation requirements and seepage losses, measurement of irrigation diversion rates, and determination of historically irrigated areas.
- **Master Plans.** Water-right master plans for municipal and private clients, including cities of Nampa and Middleton.
- **Expert Witness.** Expert witness testimony regarding water use, well interference, and the interaction of surface water and ground water in administrative hearings and district court trials.
- **Water Accounting.** Evaluation of irrigation diversions, natural flow, return flow, and storage accounting on the Payette River system for the Payette Water Users Association.
- **Reserved Water Rights.** Evaluation of Federal and Tribal in-stream flow and spring claims in the Snake and Salmon River Basins.
- **Mitigation Plans.** Preparation of mitigation plans to allow ground water diversions for irrigation and industrial use in moratorium areas or ground water management areas in the Boise River basin and Eastern Snake River Plain.

#### Mining-Related Hydrogeology

- **Malheur County, Oregon.** Groundwater exploration and characterization studies for the proposed Grassy Mountain Mining project in Malheur County, Oregon. Geochemical characterization of waste materials at the proposed Kerby Mining project near Farewell Bend, Oregon. This project involved waste evaluation for to determine the potential for acid production and heavy metal mobilization. Mr. Scanlan also conducted baseline surface and groundwater quality evaluations for permitting.
- **Gibbonsville, Idaho.** Investigations related to water rights, stream alteration, and dewatering for Lemhi Gold Trust near Gibbonsville, Idaho.
- **Alder, Montana.** Groundwater flow characterization for the Garnet USA project near Alder, Montana.



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Principal Engineer and Hydrogeologist

Terry M. Scanlan, P.E., P.G.

- **Stibnite, Idaho.** Groundwater characterization and monitoring for various mining projects near Stibnite, Idaho since the late 1980s. Mr. Scanlan is currently serving as a groundwater consultant to Midas Gold for their Golden Meadows project.
- **DeLamar, Idaho.** A two-phase study of acid mine drainage from a 15 million ton waste dump at the DeLamar silver mine in southern Idaho. The first phase of the project was a hydrologic investigation of the waste dump, which characterized the modes of acid production and transport, within and outside of the dump. The second phase consisted of an evaluation of mitigation measures, and included the conceptual level design of a composite low-permeability cover.
- **Lead, South Dakota.** Groundwater characterization studies and permit preparation for three mine waste and spent ore disposal facilities at the Annie Creek Mine, near Lead, South Dakota. Two of these disposal facilities were located on mill tailings with high arsenic concentrations, and have required investigation of arsenic, nitrate, and cyanide attenuation mechanisms in saturated and unsaturated materials.
- **Sunbeam, Idaho.** Geochemical evaluation of waste materials as part of a supplemental EIS for the Grouse Creek mining project in central Idaho. This project also included groundwater characterization.
- **Leesburg, Idaho.** Water quality and streamflow monitoring program for the Beartrack Mine EIS. Design of the domestic supply, mine-pit dewatering, and industrial supply wells for the Beartrack mining project.
- **Eureka, Nevada.** Water supply investigations for Homestake Mining Company at Eureka, Nevada.
- **Lovelock, Nevada.** Water supply investigations for the Coeur Rochester Mine near Lovelock Nevada.
- **Dry Valley, Idaho.** Pit dewatering investigations for the Dry Valley phosphate mine in southeastern Idaho.

#### Environmental

- **RCRA.** Investigation and monitoring of pentachlorophenol migration in soils and groundwater at Pressure Treated Timber Company in Boise, Idaho. Site closure for the Vale Oregon Irrigation District.
- **Petroleum Contamination.** Investigation/remediation of soil and groundwater contamination resulting from petroleum (gasoline, diesel, heating oil, hydraulic oil, and jet fuel) at more than 30 locations in Idaho, Oregon, Washington, and Wisconsin. Remedial designs have included soil land farming, venting systems, and free and dissolved product extraction systems. Groundwater treatment technologies utilized have included air stripping, carbon adsorption, and enhanced biodegradation.
- **Effluent Re-Use.** Wastewater and biosolids re-use permitting, soil monitoring, ground water monitoring, and permit annual reports for potato processors, cheese plants, and municipal wastewater.
- **Cyanide.** Research pertaining to cyanide migration and attenuation processes in soils and groundwater with particular emphasis on natural degradation mechanisms.
- **Metals.** Investigation of shallow groundwater contamination from mine tailings in Butte, Montana for ARCO, including the drilling of approximately thirty monitor wells and Hydropunch borings, aquifer testing, and water quality sampling.

#### Professional Affiliations

Idaho Ground Water Association



## CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of October, 2020, a true and correct copy of the foregoing was filed and/or served upon the following individual(s) by the means indicated:

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Michael P. Lawrence

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*Attorneys for Applicant Big Willow Ranch, LLC*

BEFORE THE DEPARTMENT OF WATER RESOURCES OF  
THE STATE OF IDAHO

IN THE MATTER OF APPLICATION  
FOR PERMIT NO. 65-23867 IN THE  
NAME OF BIG WILLOW RANCH, LLC

DECLARATION OF RON SHURTLEFF,  
WATERMASTER, WATER DISTRICT  
NO. 65

I, RON SHURTLEFF, declare:

1. I am over the age of eighteen and the facts and opinions stated below are based on my personal knowledge and experience, and if called as a witness I would and could truthfully testify thereto. I make this declaration pursuant to Idaho Code Section 9-1406.

2. I am employed by Water District No. 65. I have been appointed by the Director, Idaho Department of Water Resources, as Watermaster for Water District No. 65, which includes Basin 65 and the Payette River. I have been the Watermaster for Water District No. 65 since 2002.

3. As Watermaster for Water District No. 65, I am responsible for administering the water rights on the Payette River system, including the water rights for the federal reservoirs at Cascade and Deadwood.

4. I also am a Director on the Board of Directors of Lower Payette Ditch Company and am familiar with its facilities and operations.

**DECLARATION OF RON SHURTLEFF, WATERMASTER, WATER DIST. NO. 65- 1**

5. I have reviewed Application for Permit No. 65-23867 and I am familiar with the quantity and location of its proposed diversion and use of water.

6. Based on my personal knowledge and experience, and the records of Water District No. 65, the proposed diversion and use of water under Application for Permit No. 65-23867 will not reduce the quantity of water under existing water rights, will not conflict with the local public interest as defined in section 42-202B, Idaho Code, and is not contrary to conservation of water resources within the state of Idaho.

7. In addition, based on my personal knowledge and experience, and the records of Water District No. 65, the water supply is sufficient for the purpose for which it is sought to be appropriated under Application for Permit No. 65-23867.

8. In my capacity as Watermaster for Water District No. 65, I executed an affidavit (a true and correct copy of which is attached hereto as Exhibit A) on June 18, 2012, describing aspects of the administration of water rights in Water District No. 65. My statements in that affidavit continue to accurately describe those aspects of the administration of water rights in Water District No. 65.

9. I have reviewed the memorandum dated September 1, 2020, and prepared by Terry Scanlan of SPF Water Engineering regarding the "Analysis of Water Availability to Support Application for Permit 65-23867," and I agree with its analysis and conclusions.

10. I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

DATED this 29th day of October, 2020.

  
\_\_\_\_\_  
RON SHURTLEFF

**DECLARATION OF RON SHURTLEFF, WATERMASTER, WATER DIST. NO. 65- 2**

**EXHIBIT A**

06/18/2012 MON 13:34 FAX 2086222120 SV BUSINESS CENTER

0004/006

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Attorney General

CLIVE J. STRONG  
Deputy Attorney General  
Chief, Natural Resources Division

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Natural Resources Division

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*Attorneys for the State of Idaho*



**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. See Attachment A  
)

) **AFFIDAVIT OF RON SHURTLEFF,**  
) **WATERMASTER, WATER**  
) **DISTRICT NO. 65**

STATE OF IDAHO )

COUNTY OF BLAINE )

) ss.  
)

RON SHURTLEFF, being first duly sworn upon oath, deposes and states as follows:

1. I am over the age of eighteen and the facts stated below are based on my personal knowledge.

AFFIDAVIT OF RON SHURTLEFF, WATERMASTER, WATER DISTRICT NO. 65 - 1

**DECLARATION OF RON SHURTLEFF, WATERMASTER, WATER DIST. NO. 65- 3**

2. I am employed by Water District No. 65. I have been appointed by the Director, Idaho Department of Water Resources as Watermaster for Water District No. 65, which includes Basin 65 and the Payette River. I have been the Watermaster for Water District No. 65 since 2002.

3. As Watermaster for Water District No. 65, I am responsible for administering the water rights on the Payette River system, including the water rights for the federal reservoirs at Cascade and Deadwood.

4. As I understand and administer the water rights for the federal reservoirs in Water District No. 65, those water rights are limited to the annual volumes decreed by the SRBA District Court, and they are no longer in priority after the quantities of water diverted into the reservoirs under their water rights reaches the annual volumes decreed by the Court. Additional water may be and often is stored in the reservoirs after the annual volume has been reached, but only if all other water rights have also been filled.

5. I have reviewed the *State Of Idaho's Motion For Partial Summary Judgment* which was filed on January 25, 2012, in the SRBA proceedings for the water rights for American Falls Reservoir (subcase no. 01-2068) and Palisades Reservoir (subcase no. 01-2068). The "refill" remark that the State of Idaho proposed in that motion is consistent with how the water rights for the federal reservoirs in Water District No. 65 have been administered during my tenure as Watermaster.

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AFFIDAVIT OF RON SHURTLEFF, WATERMASTER, WATER DISTRICT NO. 65 - 2



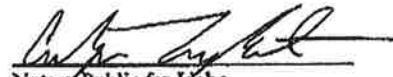
Further your affiant sayeth naught.

DATED this 18<sup>th</sup> day of June 2012.

  
RON SHURTLEFF

SUBSCRIBED AND SWORN to before me this 18<sup>th</sup> day of June 2012.



  
Notary Public for Idaho  
Residing at: Blaine County  
My commission expires: 9/1/17

AFFIDAVIT OF RON SHURTLEFF, WATERMASTER, WATER DISTRICT NO. 63 - 3

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DECLARATION OF RON SHURTLEFF, WATERMASTER, WATER DIST. NO. 65- 5

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19<sup>TH</sup> day of June 2012, I caused the foregoing AFFIDAVIT OF RON SHURTLEFF, WATERMASTER, WATER DISTRICT NO. 65 to be filed with the Court and true and correct copies served on the following parties by the methods indicated:

1. Original to:

Clerk Of The District Court Snake River Basin Adjudication 253 Third Avenue North PO Box 2707 Twin Falls, ID 83303-2707	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express <input type="checkbox"/> Facsimile: <u>(208) 736-2121</u> Phone: (208) 736-3011
---	--

2. Copies to:

Special Master Terrence A. Dolan Case Administrator Diana Delaney Snake River Basin Adjudication 253 Third Avenue North PO Box 2707 Twin Falls, ID 83303-2707	<input type="checkbox"/> U.S. Mail, postage prepaid <input checked="" type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express <input type="checkbox"/> Facsimile: <u>(208) 736-2121</u> <input checked="" type="checkbox"/> E-Mail: <u>tdolan@id.courts.net</u> <input checked="" type="checkbox"/> E-Mail: <u>ddelaney@id.courts.net</u> Phone: (208) 736-3011
James C. Tucker Idaho Power Co 1221 W. Idaho St. P.O. Box 70 Boise, ID 83707	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: <input checked="" type="checkbox"/> E-Mail: <u>JTucker@idahopower.com</u> Phone: 388-2112
Adam DeVoe Brownstein, Hyatt, Farber, Schreck 410 17th Street, Suite 2200 Denver, CO 80202	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: <input checked="" type="checkbox"/> E-Mail: <u>adevoe@bhfs.com</u>

<p>C. Thomas Arkoosh 301 Main St P.O. Box 32 Gooding, ID 83330</p>	<p><input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: <input checked="" type="checkbox"/> E-Mail: tarkoosh@capitolawgroup.com Phone: (208) 934-8872</p>
<p>Roger D Ling 615 H St P.O. Box 396 Rupert, ID 83350-0396</p>	<p><input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: <input checked="" type="checkbox"/> E-Mail: rdl@idlawfirm.com Phone: (208) 436-4717</p>
<p>Candice McHugh Racine, Olson, Nyc, Budge &amp; Bailey, Chtd. 101 Capitol Blvd., Ste. 300 Boise, ID 83702</p>	<p><input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: <input checked="" type="checkbox"/> E-Mail: cmm@racinelaw.net Phone: 395-0011</p>
<p>Randall C. Budge 221 E. Center, Ste. A2 P.O. Box 1391 Pocatello, ID 83204-1391</p>	<p><input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: <input checked="" type="checkbox"/> E-Mail: rcb@racinelaw.net Phone: (208) 232-6101</p>
<p>Travis L Thompson 113 Main Ave W., Ste 303 P.O. Box 485 Twin Falls, ID 83303-0485</p>	<p><input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: <input checked="" type="checkbox"/> E-Mail: tlth@idahowaters.com Phone: (208) 733-0700</p>
<p>Paul L. Arrington 113 Main Ave. W., Ste 303</p>	<p><input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery</p>

---

**DECLARATION OF RON SHURTLEFF, WATERMASTER, WATER DIST. NO. 65- 7**

P.O. Box 485 Twin Falls, ID 83303-0485	<input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> E-Mail: pla@idahowaters.com Phone: (208) 733-0700
John K. Simpson 1010 W. Jefferson, Ste 102 P.O. Box 2139 Boise, ID 83701-2139	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> E-Mail: jks@idahowaters.com Phone: 336-0700
W. Kent Fletcher Fletcher Law Office 1200 Overland Ave P.O. Box 248 Burley, ID 83318	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> E-Mail: wkf@pmt.org Phone: (208) 678-3250
David Gehlert US Department Of Justice 999 18 <sup>th</sup> Street, South Terrace, Ste. 370 Denver, CO 80202	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> E-Mail: david.gehlert@usdoj.gov Phone: (303) 844-1386
USDI Bureau Of Reclamation Represented By: US Department Of Justice Environment & Nat'l Resources 550 West Fort Street, MSC 033 Boise, ID 83724	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input type="checkbox"/> E-Mail: _____
United States Of America Regional Director Pn Region Bureau Of Reclamation Pn-3100 1150 N Curtis Rd Ste 100 Boise, ID 83706-1234	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____

	<input checked="" type="checkbox"/> E-Mail: mhoward@usbr.gov
American Falls Reservoir Represented by: Craig D. Hobdey 125 5 <sup>th</sup> Ave. P.O. Box 176 Gooding, ID 83330	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> E-Mail: hobdeycraig@gmail.com <input type="checkbox"/> Statehouse Mail Phone: (208) 934-4429
American Falls Spaccholders New Sweden Irrigation Dist. Represented by: Jerry R. Rigby 25 N. 2 <sup>nd</sup> E. P.O. Box 250 Rexburg, ID 83440-0250	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input type="checkbox"/> E-Mail: _____ <input type="checkbox"/> Statehouse Mail Phone: (208) 356-3633
Josephine P. Beeman Beeman & Associates, P.C. 409 W Jefferson St Boise, ID 83702	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> E-Mail: jo.beeman@beemanlaw.com Phone: 331-0950
State Of Idaho Represented By: Natural Resources Div. Chief State Of Idaho Attorney General's Office P.O. Box 44449 Boise, ID 83711-4449	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express <input type="checkbox"/> Facsimile: _____ <input type="checkbox"/> E-Mail: _____ <input checked="" type="checkbox"/> Not applicable
IDWR Document Depository P.O. Box 83720 Boise, ID 83720-0098	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express <input type="checkbox"/> Facsimile: _____ <input type="checkbox"/> E-Mail: _____ <input checked="" type="checkbox"/> Statehouse Mail
Scott L. Campbell	<input type="checkbox"/> U.S. Mail, Postage Prepaid

101 S. Capitol Blvd. 10 <sup>th</sup> Fl. P.O. Box 829 Boise, ID 83701-0829	<input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input checked="" type="checkbox"/> E-Mail: slc@moffatt.com <input type="checkbox"/> Statehouse Mail Phone: 345-2000
Charles F. McDevitt 420 W. Bannock St. P.O. Box 2564 Boise, ID 83701-0829	<input checked="" type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input type="checkbox"/> E-Mail: chas@mcdevitt-miller.com <input type="checkbox"/> Statehouse Mail Phone: 343-7500
Albert P. Baker Shelly Davis 1010 W. Jefferson, Ste. 102 P.O. Box 2139 Boise, ID 83701-2139	<input checked="" type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Federal Express Priority Overnight <input type="checkbox"/> Facsimile: _____ <input type="checkbox"/> E-Mail: apb@idahowaters.com <input type="checkbox"/> Statehouse Mail Phone: 336-0700

  
Olga L. Valdivia  
Legal Assistant

ATTACHMENT A

01-02064  
01-02064A  
01-02064E  
01-02064F  
01-02064L  
01-10042  
01-10042A  
01-10042B  
01-10053A  
01-10190  
(American Falls Subcases)

01-02068  
01-02068D  
01-02068E  
01-02068F  
01-02068M  
01-02068Y  
01-10043  
01-10043A  
01-10043E  
01-10191  
01-10389  
(Palisades Subcases)

## CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of October, 2020, a true and correct copy of the foregoing was filed and/or served upon the following individual(s) by the means indicated:

### DOCUMENT FILED:

Nick Miller  
Manager, Western Regional Office  
Idaho Department of Water Resources  
2735 Airport Way  
Boise, ID 83705  
Phone: (208) 334-2190  
Email: [nick.miller@idwr.idaho.gov](mailto:nick.miller@idwr.idaho.gov)

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☐ Express Mail  
☒ Hand Delivery  
☐ Facsimile  
☐ Email

James Cefalo, Hearing Officer  
Eastern Regional Office, Idaho Department of  
Water Resources  
900 North Skyline Dr., Ste. A  
Idaho Falls ID 83402-6105  
Email: [James.Cefalo@idwr.idaho.gov](mailto:James.Cefalo@idwr.idaho.gov)

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### DOCUMENT SERVED:

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3101 South Powerline Road  
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Frederic Price  
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Bureau of Land Management  
Idaho State Office  
1387 South Vinell Way  
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☐ Hand Delivery  
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Email: emcgarry@usbr.gov

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☒ Email

Lisa C. Lance  
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Office of the Solicitor  
Boise Field Office  
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Neil Shippy  
Emmett Irrigation District  
22 E Park St  
Emmett, ID 83617  
Phone: (208) 365-8983  
Email: emmettirrigationshop@gmail.com

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☐ Facsimile  
☒ Email

By:   
Michael P. Lawrence

RECEIVED

OCT 30 2020

WATER RESOURCES  
WESTERN REGION

# GIVENS PURSLEY LLP

Attorneys and Counselors at Law

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Facsimile: 208-388-1300  
  
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Gary G. Allen  
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Preston N. Carter  
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William C. Cole  
Michael C. Creamer  
Amber N. Dina  
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Kersti H. Kennedy

Neal A. Koskella  
Debra K. Kristensen  
Michael P. Lawrence  
Franklin G. Lee  
David R. Lombardi  
Kimberly D. Maloney  
Kenneth R. McClure  
Kelly Greene McConnell  
Alex P. McLaughlin  
Melodie A. McQuade  
Christopher H. Meyer  
L. Edward Miller  
Patrick J. Miller  
Judson B. Montgomery  
Emily G. Mueller  
Deborah E. Nelson

W. Hugh O'Riordan, LL.M.  
Randall A. Peterman  
Jack W. Relf  
Michael O. Roe  
Jamie Caplan Smith  
P. Mark Thompson  
Jeffrey A. Warr  
Robert B. White

Kenneth L. Pursley (1940-2015)  
James A. McClure (1924-2011)  
Raymond D. Givens (1917-2008)

October 30, 2020

***Via Hand Delivery***

Idaho Department of Water Resources  
2735 Airport Way  
Boise, ID 83705-5082

Re: Big Willow Ranch, LLC's Expert Witness Statements and Opinions

Dear Clerk,

Enclosed herewith please find:

- *Big Willow Ranch, LLC's Notice of Service of Applicants Initial Expert Witness Statements and Opinions,*
- *Declaration of Terry Scanlan, P.E., P.G., and*
- *Declaration of Ron Shurtleff, Watermaster, Water District No. 65*

Please do not hesitate to contact this office should you have any questions.

Sincerely,



Harmony R. Wright

MPL/hrw  
Enclosures