

IN THE MATTER OF APPLICATION FOR TRANSFER NO. 81800 IN THE NAME OF CASA DEL NORTE, LP

I hereby certify that on January 17, 2020, I served a true and correct copy of **KELLY AND PAULA RIGGS' ANSWERS AND RESPONSES TO CASA DEL NORTE, LP. FIRST SET OF DISCOVERY** to the following by the method indicated:

Charles L. Honsinger

X Electronic Mail

Honsinger Law, PLLC

PO Box 517

Boise, Idaho 83701

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Norman M. Semanko

X Electronic Mail

Parsons Behle & Latimer

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James Cefalo

X Electronic Mail

Idaho Department of Water Resources

900 North Skyline Drive, Suite A, Idaho Falls, ID 83402-1718

James.Cefalo@idwr.idaho.gov

Dated August 20, 2019

A handwritten signature in blue ink that reads "Paula Riggs". The signature is written over a horizontal line.

Paula Riggs

IN THE MATTER OF APPLICATION FOR TRANSFER NO. 81800 IN THE NAME OF CASA DEL NORTE, LP.

RE: KELLY AND PAULA RIGGS' ANSWERS AND RESPONSES TO CASA DEL NORTE, LP. FIRST SET OF DISCOVERY

INTERROGATORIES

NO. 1:

Kelly Riggs, 5420 W. Double Anchor Drive, Glenns Ferry Idaho 83623, 208-761-8520

Paula Riggs, Spouse, 5420 W Double Anchor Drive, Glenns Ferry Idaho 83623, 208-599-0446

NO. 2:

N/A

NO. 3:

Lynn Riggs and Harley Riggs, Double Anchor Ranches, Inc.

Charles Honsinger, Honsinger Law – Attorney for Double Anchor Ranches, Inc.

Ed Squire, Hydrologic, Inc.

a) No

b) I am aware Lynn, Harley, Charles and Ed are involved in the protest by Double Anchor Ranches, Inc. Mr. Miller has knowledge of the transfer application and protest.

NO. 4:

None

NO. 5:

None

NO. 6:

1. Cold Springs Creek Water District 61-E Water Master notes, reports and emails that specifically refer to the damaging water use practices and violations of water administration by Casa Del Norte, LP. Exhibit #201
2. Idaho Department of Water Resources email that specifically refers to the violation of administration of water by Casa Del Norte, LP. Exhibit #202
3. Emails from Charles Honsinger, Attorney at Law to IDWR and Rich Neal, Water Master showing proof of damaging water use practices and violations of water administration by Casa Del Norte, LP. Exhibit 203
4. Any or all maps, historical water reports, emails and/or notes to be used as exhibits obtained between now and February 10, 2020.

NO. 7:

Please see response to NO. 6. All documents are located on the IDWR website under water district 61-E documents.

NO. 8:

Please see response to NO. 6

NO. 9:

Please see response to NO. 6

NO. 10:

None

NO. 11:

None

NO. 12:

- a) 61-341; Priority Date 05/07/1887; Cold Springs Creek - Irrigation
61-342; Priority Date 06/30/1887; Cold Springs Creek - Irrigation
61-10299; Priority Date 03/15/1943; Cold Springs Creek - Irrigation
61-10300; Priority Date 04/16/1960; Ground Water – Stock water
- b) In accordance with the original intent and decree
- c) See attached maps from IDWR.
- d) 2016: 171 (6%)
2017: 132.22 (5.5%)
2018: 37 (2.44%)
- e) See attached maps from IDWR in item C.
POU Total Acres: 120.0; NWSW 36 ac – SWNE 35 ac – SWNW 33 ac – SWSW 16 Ac
61-341: Cold Springs Creek NWSWSE Sec. 16, T04S, R09E, Elmore County
Cold Springs Creek NENW Sec. 28, T04s, R09E, Elmore County
61-342: Cold Springs Creek NWSWSE Sec. 16, T04S, R09E, Elmore County
Cold Springs Creek NENW Sec. 28, T04s, R09E, Elmore County
61-10299: Cold Springs Creek NWSWSE Sec. 16, T04S, R09E, Elmore County
Cold Springs Creek NENW Sec. 28, T04s, R09E, Elmore County
61-10300: SENESW Dec. 28, T04S, R09E, Elmore County
- f) 24 inch pipe with lockable slide gate from creek to a 36 inch Cippoletti open weir with open ditches to point of delivery.
- g) Kelly and Paula Riggs: 2018; \$165.38

KELLY AND PAULA RIGGS' ANSWERS AND RESPONSES TO CASA DEL NORTE, LP. FIRST SET OF DISCOVERY - 2

NO. 13:

N/A

REQUESTS FOR PRODUCTION OF DOCUMENTS

NO. 1: N/A

NO. 2: N/A

NO. 3: Please see response to Interrogatories NO. 6

NO. 4: Please see response to Interrogatories NO. 6

NO. 5: N/A

NO. 6: Please see all documents in the IDWR Water Rights database for Transfer Application No. 80342 including all protests.

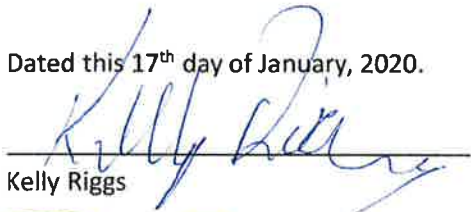
NO. 7: Please see Interrogatories NO. 6.

NO. 8: Pursuant to Rule 602 of the Departments Rules of Procedure, the hearing officer will take notice of these documents from the Department Records assigned with the exhibit number IDWR 5.

NO. 9: Same answer as Interrogatory No. 6 that may be obtained before February 10, 2020.

NO. 10: Communication with Water Master was by phone call or in person.

Dated this 17th day of January, 2020.


Kelly Riggs


Paula Riggs

**KELLY AND PAULA RIGGS' ANSWERS AND RESPONSES TO CASA DEL NORTE, LP. FIRST SET OF
DISCOVERY - 3**