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RECEIVED
JUL 10 2017
Department of Water Resources
Eastern Region

6
7 **BEFORE THE DEPARTMENT OF WATER RESOURCES**
8 **OF THE STATE OF IDAHO**
9

10 IN THE MATTER OF APPLICATION
FOR TRANSFER NO. 81155 IN THE
11 NAME OF CITY OF POCATELLO

RESPONSE TO CITY'S MOTION TO
DISMISS PROTEST AND OBJECTION
TO ALTERNATIVE MOTION IN LIMINE

12
13 Protestant Spartan Portneuf, LLC, ("Spartan Portneuf"), by and through counsel, Laura
14 A. Schroeder and James Browitt of Schroeder Law Offices, P.C., hereby responds to the *Motion*
15 *to Dismiss Protest and in the Alternative Motion in Limine* ("Motion to Dismiss") filed by the
16 City of Pocatello ("City" or "Pocatello").

17 **BACKGROUND**

18 Spartan Portneuf is the owner of water right No. 29-13425, under which 0.676 cubic feet
19 per second ("cfs") may be appropriated for irrigation and stock water purposes. No. 29-13425 is
20 one of three water rights which use a well located in the NWSWSW of Sec. 16, Township 7S,
21 Range 35 East, Bannock County, for ground water diversion.¹

22 In 1999, the City drilled Well No. 44 — approximately 600 feet from the well serving
23 right No. 29-13425 — with the intention of adding it as an alternate point of diversion ("POD")
24

25 ¹ These three rights descend from license No. 29-2039. A split necessitated by a change of ownership created 29-
26 13424 and 29-13425, which were claimed in the Snake River Basin Adjudication ("SRBA"). A subsequent split of
29-13424 created 29-14148. All three rights were decreed in the SRBA with a priority date of September 5, 1951.



1 for certain water rights served by Pocatello's interconnected well system. To accomplish this, the
2 City filed Application for Transfer No. 5452 ("T-5452") with the Idaho Department of Water
3 Resources ("IDWR"), proposing that Well No. 44 become one of 13 PODs used by water rights
4 Nos. 29-2274, 29-2338 and 29-7375. IDWR approved T-5452, and the three subject water rights
5 were decreed in the SRBA with conditions consistent with those delineated in T-5452.

6 Having recently decided to relocate another of its wells, No. 39, the City filed three
7 applications for transfer seeking authorization to divert water from the new well site. IDWR
8 approved two transfers, while the third, Application for Transfer No. 81155 ("T-81155"), which
9 involved rights Nos. 29-2274, 29-2338 and 29-7375, and consequently Well No. 44, was
10 protested by Spartan Portneuf. *Notice of Protest*, September 26, 2016 ("Protest"). Spartan
11 Portneuf contended in the Protest that the proposed transfer "will exacerbate existing problem of
12 city's operation of Well No. 44."

13 The City has asserted that T-81155 will not affect the operation of Well No. 44 "in any
14 way," Motion to Dismiss, p. 5, and presented various arguments to that effect, including an
15 Alternative Motion in Limine seeking to restrict the evidence to be considered if the protest is
16 allowed to proceed. Spartan Portneuf addresses the City's contentions in turn.

17 ARGUMENT

18 The premise of the City's position in this matter is that T-81155 only relates to the
19 relocation and operation of Well No. 39 that is located approximately 13 miles northwest of Well
20 No. 44. However, this is not the only change to water rights Nos. 29-2274, 29-2338 and 29-7375
21 that T-81155 proposes. The application removes two PODs², for which the City offers no
22 explanation. Further, information available from IDWR and the City itself raises questions
23 regarding the status of five of the 11 wells identified in T-81155, including whether they still
24

25 ² Water rights Nos. 29-2274, 29-2338 and 29-7375 all list NESE Sec. 12, T6S, R33E, Power County, and two
26 locations at SENE Sec. 35, T6S, R34E, Bannock County, among their 13 PODs. The aforementioned Power County
site and one of the Bannock County sites are not among the 11 PODs identified in T-81155.

1 exist. Spartan Portneuf has asked for clarity, *see* Exhibit 1, *Letter to City dated April 14, 2017*,
2 (“April 14 Letter”) but to this point the City has provided none. Therefore, Pocatello’s attempts
3 to narrow the scope of this proceeding seem disingenuous, as do its bases for requesting
4 dismissal.

5 **A. IDWR is statutorily obligated to consider all implications of T-81155.**

6 As the City points out, *see* Motion to Dismiss, p. 5, Idaho Code 42-222(1) establishes that
7 any change in a water right, including point of diversion, must be approved by IDWR. The
8 statute goes on to say that IDWR “shall examine all the evidence and available information
9 and shall approve the change in whole, or in part, or upon conditions, provided no other water
10 rights are injured thereby.” (Emphasis added). The City insists that the only change proposed in
11 T-81155, and therefore the only issue that should be weighed, is whether the relocation of Well
12 No. 39 will injure Spartan Portneuf’s water right, No. 29-13425.

13 Yet as stated above, that would be an incomplete assessment of the potential impact T-
14 81155 would have on existing rights, including those owned by parties other than Spartan
15 Portneuf.³ Two of the 13 PODs listed on the three water rights subject to T-81155 were not
16 included in the transfer application, so it is not unreasonable to question how this change will
17 affect the production demands on the other 11 wells, among them No. 44.

18 Moreover, it cannot be presumed that all 11 wells identified in T-81155 are active. First,
19 the well production value spreadsheets provided by the City for 2015 and 2016 (Exhibit 2) do not
20 include data for Well Nos. 4, 6, 7, 8 and, 9, all of which are listed in Section 5 of the City’s
21 application. And second, a document found in IDWR’s SRBA claim file for Pocatello (p. 50)
22 suggests that the aforementioned wells are either not in use or do not exist (Exhibit 3).

23
24 ³ Idaho Code 42-222(1) does not require that IDWR’s examination of a proposed transfer be triggered by a protest.
25 *See Barron v. Idaho Dep’t of Water Res. (in Re Transfer No. 5116)*, 135 Idaho 414, 421, 18 P.3d 219, 226 (2001).
26 Therefore, it follows that the department is obligated to consider the impact a transfer may have on water rights
owned by parties which did not file a protest, such as the owners who share the POD with Spartan Portneuf.

1 The reason for these discrepancies is not clear, and even if there is a rational explanation
2 it has yet to be offered. Spartan Portneuf made specific inquiries in its April 14 Letter to the City,
3 to which it received no response. But if nearly half of the PODs listed in T-81155 are not
4 associated with functioning wells, then the application is, at best, misleading and its
5 representations demand close scrutiny. In fact, IDWR is obliged to do so. Requiring an applicant
6 to provide evidence of non-injury is what enables the department to discharge its statutory
7 obligation. *Barron v. Idaho Dep't of Water Res. (in re Transfer No. 5116)*, 135 Idaho 414, 420,
8 18 P.3d 219, 225 (2001).

9 **B. Spartan Portneuf's Protest challenges the proposed transfer, not previous**
10 **administrative and judicial determinations.**

11 Spartan Portneuf does not deny that it has felt aggrieved by the City's operation of Well
12 No. 44; indeed, Spartan Portneuf acknowledged as much in its Protest by referring to an
13 "existing problem." However, that acknowledgment does shape this Protest as a "collateral
14 attack" on the two prior proceedings that authorized Well No. 44 as an alternate point of
15 diversion for the subject water rights — T-5452 and the decrees entered in the SRBA. Spartan
16 Portneuf does not challenge those determinations, as the City has suggested. Motion to Dismiss,
17 p. 6. Rather, Spartan Portneuf contests the changes proposed in T-81155, changes it believes will
18 "exacerbate" the "existing problem."

19 IDWR characterizes a transfer as a permanent or long-term change to a water right's
20 point of diversion, place of use, period of use, and/or nature of use.⁴ In other words, this is a
21 change to one or more of an established right's elements, that only its owner can propose.
22 Through T-81155, the City proposes a change in POD for subject rights Nos. 29-2274, 29-2338
23 and 29-7375. With its Protest, Spartan Portneuf simply contests this proposal on the basis that it
24 will further injure right No. 29-13425 — it is not challenging the underlying determinations of T-
25 5452 or any SRBA decree. A collateral attack is defined as "[a]n attack on a judgment in a
26

⁴ <https://www.idwr.idaho.gov/water-rights/transfers/>

1 proceeding other than a direct appeal,” *Black’s Law Dictionary*, 3rd Ed., and Spartan Portneuf’s
2 intent in this instance cannot be construed as such.

3 **C. Spartan Portneuf has standing to pursue Protest.**

4 The City claims T-81155 will have no effect on Well No. 44 because the purported
5 subject of the transfer, the relocation of Well No. 39, occurred approximately 13 miles away.
6 Motion to Dismiss, p. 4. Pocatello suggests this distance precludes any causal connection
7 between the proposed change and any injury Spartan Portneuf alleges, *Id.* at 7, thereby leaving
8 Spartan Portneuf without standing to pursue this Protest. But as demonstrated above, T-81155
9 proposes changes to the subject water rights beyond the relocation of a single POD, any of which
10 could result in injury to Spartan Portneuf’s existing water right, No. 29-13425. These
11 connections aside, it seems odd that the City is attempting to isolate wells that it has itself
12 described as part of an interconnected system.

13 IDWR cannot conclude that there is no connection between the actions proposed in T-
14 81155 and potential injury to Spartan Portneuf simply because the City says so. Pursuant to I.C.
15 42-222(1), it is the department’s duty to investigate “any protest,” and to consider “all the
16 evidence and available information,” very little of which the City has produced thus far.

17 **OBJECTION TO CITY’S MOTION IN LIMINE**

18 As stated above, the City’s attempts to limit the scope of this proceeding — to remove
19 from consideration every aspect other than the relocation of Well No. 39 — seem dubious.
20 Spartan Portneuf’s requests for information or some explanation regarding its concerns with T-
21 81155 have drawn reluctant responses from the City, if any response at all. For that reason,
22 Pocatello’s insistence that information related to the operation of Well No. 44 is irrelevant to this
23 proceeding and should be excluded raises question as to what that information may reveal.
24 Again, IDWR is statutorily obligated to consider “all the evidence and available information” in
25 rendering a decision on an application for transfer. I.C. 42-222(1).
26

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of July, 2017, I caused a true and correct copy of the RESPONSE TO CITY'S MOTION TO DISMISS PROTEST AND OBJECTION TO ALTERNATIVE MOTION IN LIMINE to be delivered to the following by U.S. Mail.

Dean Tranmer
City Attorney for City of Pocatello
911 N. 7th Ave
P.O. Box 4169
Pocatello, ID 83201

Sarah A. Klahn
White & Jankowski, LLP
511 Sixteenth Street, Suite 500
Denver, CO 80202

[Handwritten signature]

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EXHIBIT 1

EXHIBIT 1

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Therese A. Ure
Licensed in Oregon
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William F. Schroeder
(1928 - 2015)



Sarah R. Liljefelt
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Of Counsel
Licensed in Oregon & Washington

James Browitt
Of Counsel
Licensed in Idaho & Washington

April 14, 2017

VIA US MAIL and EMAIL

Tiffany G. Olsen
City of Pocatello
911 North 7th, P.O. Box 4169
Pocatello, ID, 83205
Email: tolsen@pocatello.us

RE: Spartan Portneuf, LLC Protest

Dear Ms. Olsen:

We have reviewed the responses from Justin Armstrong and well data that you forwarded to us in February. We have also had the opportunity to review some background information on the transfer at issue provided by James Cefalo of the Idaho Department of Water Resources. Your cooperation, as well as IDWR's, is greatly appreciated.

However, our ability to thoroughly analyze the situation is hampered by missing or incomplete information that we hope the City will be able to provide.

We are particularly curious about the production capacity of Well No. 44. Although the Drillers Log on file with IDWR illustrates the well's construction details, neither it nor any other document to which we have had access, indicates its gallons-per-minute potential or its maximum diversion rate (cubic feet per second). This information is likely relevant in determining how the operation of Well No. 44 might reduce the quantity of water allocated under existing rights to Spartan Portneuf, LLC.

Also, the well production value spreadsheets for 2015 and 2016 do not include information for five of the 11 wells/points of diversion identified in the transfer application. Although Mr. Armstrong indicated in his written response to our inquiries that the reports show the total annual production for all city wells, there does not appear to be any data for Wells 4, 6, 7, 8, and 9. Of the six points of diversion for Water Rights 29-2274, 29-2338 and 29-7375 included on the production value spreadsheets, we recognize that Well No. 44 was the top producer gallon-wise for both years. However, we cannot determine what portion of the water allocated under those three water rights comes from Well No. 44 without knowing what the other five wells produce on an annual basis.

(P0366400, 1414 00 LMM)

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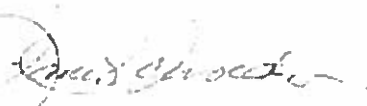
Exhibit 1
Page 1 of 2

Tiffany Olsen
April 14, 2017
Page 2 of 2

It is our position that a condition consistent with what the Idaho Supreme Court approved in *Pocatello v. Idaho* should be affixed to the three water rights subject to the proposed transfer. The condition, which the Supreme Court deemed necessary for effective administration of Pocatello's interconnected well system under the prior appropriation doctrine, is a reasonable accommodation. For if the proposed transfer indeed has as insignificant impact on Well No. 44 (and, consequently, the well owned by Spartan Portneuf, LLC), as the city contends, the three affected water rights will be minimally compromised, and only then in times of shortage.

Again, your cooperation in this matter is sincerely appreciated. We look forward to working with you to craft a resolution that both parties feel is acceptable and appropriate.

Very truly yours,
SCHROEDER LAW OFFICES, P.C.



Laura A. Schroeder
James Browitt

EXHIBIT 2

EXHIBIT 2

City of Pocatello
Water Department

2015
WELL PRODUCTION VALUES

	Well #2	Well #3	Well #10	Well #12	Well #13	Well #16	Well #15	Well #21	Well #25	Well #27	Well #28	Well #29	Well #31	Well #32	Well #34	Well #35	Well #36	Well #39	Well #44	Total Well
January	18,425,000	.000	.000	.000	8,787,000	859,000	.000	86,896,000	3,437,000	34,697,000	.000	1,427,000	.000	.000	.000	1,045,000	.000	.000	17,743,000	187,255,000
February	.000	.000	.000	.000	7,372,000	.000	.000	78,284,000	1,331,000	50,281,000	.000	1,428,000	.000	.000	.000	693,000	.000	.000	36,154,000	175,541,000
March	.000	.000	.000	.000	18,501,000	3,081,000	.000	86,537,000	6,387,000	82,451,000	.000	22,000	.000	.000	.000	803,000	1,073,000	.000	40,250,000	219,387,000
April	.000	5,884,000	.000	.000	15,204,000	19,869,000	.000	84,853,000	27,403,000	77,511,000	.000	28,435,000	.000	.000	11,021,000	2,638,000	21,488,000	.000	33,112,000	335,813,000
May	19,550,000	47,167,000	.000	.000	21,918,000	11,023,000	55,443,000	87,761,000	19,045,000	71,878,000	.000	18,777,000	.000	.000	25,252,000	6,375,000	11,873,000	8,000	18,981,000	411,440,000
June	39,571,000	60,282,000	72,118,000	11,477,000	33,164,000	14,978,000	87,341,000	85,155,000	24,576,000	82,684,000	.000	44,902,000	39,231,000	6,383,000	24,609,000	8,815,000	28,635,000	.000	11,976,000	651,832,000
July	44,214,000	55,764,000	55,087,000	21,520,000	34,828,000	42,252,000	56,193,000	88,270,000	30,000,000	78,197,000	.000	35,304,000	62,335,000	5,194,000	79,372,000	6,638,000	19,046,000	.000	34,284,000	748,591,000
August	45,750,000	52,268,000	70,842,000	31,011,000	33,318,000	2,053,000	52,534,000	86,912,000	28,252,000	85,905,000	.000	8,528,000	83,809,000	6,532,000	.000	7,890,000	12,317,000	.000	44,869,000	661,608,000
September	39,178,000	42,844,000	48,589,000	21,635,000	23,810,000	942,000	48,833,000	84,069,000	18,345,000	76,540,000	.000	3,387,000	89,260,000	2,348,000	.000	5,303,000	8,141,000	.000	38,832,000	559,895,000
October	40,435,000	17,929,000	4,288,000	6,136,000	9,036,000	.000	72,397,000	85,473,000	568,000	59,519,000	.000	.000	75,832,000	.000	.000	7,027,000	.000	.000	31,476,000	359,282,000
November	21,872,000	.000	.000	.000	8,478,000	.000	.000	82,821,000	353,000	56,456,000	.000	.000	.000	2,663,000	.000	676,000	.000	.000	5,526,000	182,145,000
December	13,923,000	.000	.000	.000	8,883,000	.000	.000	85,905,000	369,000	67,242,000	.000	.000	.000	.000	.000	650,000	.000	.000	6,769,000	183,741,000
Total	288,119,000	281,118,400	251,681,000	90,079,000	221,359,980	84,337,000	382,681,000	1,023,226,000	157,072,000	826,278,000	.000	141,186,000	389,407,000	54,742,000	148,252,000	45,124,000	100,821,000	8,908	317,784,896	4,485,629,000

City of Pocatello
Water Department

2016
WELL PRODUCTION VALUES

	Well #38	38 Chlor	Well #13	13 Chlor	Well #28	28 Chlor	Well #2	2 Chlor	Well #3	3 Chlor	Well #12	12 Chlor	Well #16	16 Chlor	Well #44	44 Chlor
January	.000	0	16,706,000	77	.000	0	19,342,000	74	.000	0	.000	0	148,000	1	6,894,000	33
February	.000	0	12,765,000	54	.000	0	16,340,000	58	.000	0	.000	0	.000	0	6,480,000	31
March	.000	0	12,476,000	56	.000	0	11,706,000	44	.000	0	.000	0	.000	0	6,012,000	36
April	1,267,000	10	21,739,000	67	.000	0	29,960,000	94	.000	0	.000	0	.000	0	8,713,000	38
May	11,055,000	62	919,000	3	.000	0	30,624,000	148	.000	0	5,645,000	27	64,308,000	224	14,161,000	63
June	27,892,000	129	42,581,000	211	.000	0	32,547,000	202	37,724,000	81	32,887,000	148	52,773,000	217	39,908,000	163
July	26,126,000	117	43,396,000	130	.000	0	34,937,000	186	61,319,000	137	29,350,000	167	46,748,000	8	42,365,000	154
August	26,826,000	113	42,062,000	213	.000	0	37,617,000	169	56,678,000	131	34,678,000	167	62,898,000	344	42,644,000	161
September	6,961,000	33	26,338,000	92	.000	0	37,760,000	155	26,249,000	86	22,837,000	95	61,773,000	260	28,348,000	104
October	.000	0	8,379,000	27	.000	0	23,397,000	97	1,213,000	4	299,000	2	30,674,000	142	14,471,000	50
November	.000	0	3,635,000	13	.000	0	19,505,000	97	.000	0	.000	0	2,976,000	13	8,051,000	30
December	.000	0	376,000	5	.000	0	19,783,000	112	.000	0	.000	0	.000	0	9,774,000	31
Total	101,417,000	454	231,362,000	870	.000	0	312,516,000	1,434	185,582,000	439	125,706,000	616	344,408,000	1,212	231,838,000	884
	Well #36	36 Chlor	Well #13	13 Chlor	Well #28	28 Chlor	Well #2	2 Chlor	Well #3	3 Chlor	Well #12	12 Chlor	Well #16	16 Chlor	Well #44	44 Chlor

	Well #10	10 Chlor	Well #29	29 Chlor	Well #21	21 Chlor	Well #27	27 Chlor	Well #34	34 Chlor	Well #31	31 Chlor	Well #18	18 Chlor	Well #26	26 Chlor
January	.000	0	.000	0	85,638,000	345	63,269,000	232	.000	0	.000	0	.000	0	348,000	1
February	.000	0	.000	0	80,314,000	342	64,850,000	269	.000	0	.000	0	.000	0	.000	0
March	.000	0	.000	0	85,500,000	353	68,735,000	284	.000	0	.000	0	.000	0	.000	0
April	.000	0	.000	0	83,459,000	352	75,039,000	256	.000	0	.000	0	.000	0	4,747,000	20
May	.000	0	58,902,000	165	85,541,000	367	83,087,000	279	3,459,000	10	.000	0	.000	0	27,546,000	122
June	80,095,000	154	49,386,000	122	83,888,000	351	71,232,000	226	4,803,000	15	123,721,000	309	8,044,000	36	37,468,000	207
July	82,314,000	214	69,352,000	181	85,387,000	331	76,841,000	203	9,654,000	31	132,687,000	331	47,008,000	228	42,228,000	228
August	71,268,000	182	37,124,000	81	85,382,000	328	78,884,000	184	.000	0	134,584,000	327	28,870,000	129	39,340,000	212
September	17,834,000	40	8,891,000	24	82,617,000	308	57,421,000	134	.000	0	97,725,000	220	3,051,000	17	15,674,000	89
October	99,000	0	.000	0	84,943,000	317	61,631,000	157	.000	0	28,308,000	55	.000	0	.000	0
November	.000	0	.000	0	82,721,000	306	63,404,000	204	.000	0	.000	0	.000	0	.000	0
December	.000	0	.000	0	85,347,000	320	70,059,000	188	.000	0	.000	0	.000	0	3,827,000	32
Total	231,308,000	590	221,655,000	583	1,012,747,000	4,018	841,251,000	2,616	18,216,000	56	517,023,000	1,242	87,782,000	402	171,176,000	911
	Well #10	10 Chlor	Well #29	29 Chlor	Well #21	21 Chlor	Well #27	27 Chlor	Well #34	34 Chlor	Well #31	31 Chlor	Well #18	18 Chlor	Well #26	26 Chlor

	Well #32	32 Chlor	Well #35	35 Chlor	Well #39	39 Chlor	Total Well	Total Chlorine	Spaulding	Riverside	Feed Line	FL Chlor	West Bench	WB Chlor
January	.000	0	1,037,000	4	.000	0	184,383,000	782	3,504,000	17,085,000	.000		5,000,000	15
February	.000	0	1,099,000	4	.000	0	180,835,000	770	3,864,000	16,008,000	.000	41	4,345,000	12
March	465,000	0	1,023,000	4	.000	0	188,937,000	771	5,238,000	16,859,000	.000	39	4,812,000	12
April	.000	0	2,659,000	9	.000	0	228,071,000	880	6,178,000	28,778,000	.000	75	5,473,000	14
May	3,205,000	10	479,000	2	4,845,000	18	391,697,000	1,488	10,027,000	61,621,000	.000	0	9,097,000	0
June	11,650,000	36	557,000	2	5,622,000	19	728,586,000	2,714	.000	.000	35,957,000	104	22,250,000	84
July	3,016,000	10	689,000	2	10,290,000	32	845,514,000	2,954	21,899,000	135,700,000	.000	131	26,843,000	74
August	4,461,000	18	457,000	2	7,843,000	25	813,033,000	2,882	22,953,000	133,864,000	.000	136	25,682,000	78
September	830,000	2	121,000	0	6,694,000	20	505,615,000	1,713	13,544,000	75,382,000	.000	92	14,815,000	42
October	.000	0	458,000	1	3,398,000	11	250,717,000	847	4,372,000	29,750,000	.000	29	8,293,000	16
November	.000	0	307,000	1	450,000	1	182,948,000	686	2,654,000	17,322,000	.000	32	4,242,000	23
December	.000	0	342,000	1	2,190,000	10	191,707,000	733	3,569,000	17,688,000	.000	47	4,806,000	24
Total	23,537,000	74	9,225,000	32	41,893,000	134	4,701,133,000	17,200	97,642,000	550,015,000	.000	726,000	186,674,000	726
	Well #32	32 Chlor	Well #35	35 Chlor	Well #39	39 Chlor	Total Well	Total Chlorine	Spaulding	Riverside	Feed Line	FL Chlor	West Bench	WB Chlor

EXHIBIT 3

EXHIBIT 3

TRANSFER NO. 5452 POINTS OF DIVERSION

T06S R33E S10 NESE Within POWER County	Well No. 35 (Phillips 3)
T06S R33E S12 NESE Within POWER County	No well at this location
T06S R33E S15 SWNE Within POWER County	Well No. 39
T06S R34E S15 NWSW Within BANNOCK County	No well at this location
T06S R34E S26 NENW Within BANNOCK County	Well No. 10
T06S R34E S27 NWSE Within BANNOCK County	No well at this location
T06S R34E S35 SENE Within BANNOCK County	Well No. 12
T06S R34E S35 SENE Within BANNOCK County	Only Well No. 12 at this location
T06S R34E S35 NWSE Within BANNOCK County	Well No. 7 (Well No. 7 is not in use)
T06S R34E S35 NWSE Within BANNOCK County	Only Well No. 7 at this location
T06S R34E S35 NWSE Within BANNOCK County	Only Well No. 7 at this location
T07S R34E S1 SESE Within BANNOCK County	Well No. 13 or 17 (Riverside G.C.)
T07S R35E S16 SWSW Within BANNOCK County	Well No. 44