

March 2, 2017

James Cefalo
Idaho Department of Water Resources
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718

Re: Hunter Transfer Nos. 81292 and 81293

Mr. Cefalo,

The *Notice of Hearing and Discovery/Disclosure Order* issued February 6, 2017, in this matter requires the parties to notify the Department of topics and questions to be answered by Department staff at the hearing. IGWA requests the following topics and questions be addressed:

Topic: Enlargement

1. Total acres of land within the Aberdeen-Springfield Canal Company (ASCC) service area.
2. Total acres authorized for irrigation under ASCC surface water rights within the ASCC service area.
3. Total acres authorized for irrigation under groundwater rights within the ASCC service area.
4. Total acres land within the ASCC service area that are presently covered with both surface and ground water rights (so-called "stacked rights").
5. Of the lands within the ASCC service area covered by stacked rights, the number of acres under groundwater rights that (a) contain a decreed remark referring directly or indirectly to a combined use with service water, (b) do not contain a decreed remark but do contain an explanatory remark referring directly or indirectly to combined use with surface water, and (c) do not contain either a decreed remark or an explanatory remark referring directly or indirectly to combined use with surface water.

Topic: Explanatory Remarks

6. The Department's processes, policies, and practices for inserting explanatory remarks into water rights generally.

7. The history and justification for the Department's insertion of the following explanatory remark on water right no. 35-2824: "Use of this right is combined with water from Aberdeen-Springfield Canal Co."

I would like to depose the Department employee(s) identified to address the above questions in advance of the hearing; therefore, I kindly ask that they be identified by the end of March so that a deposition can be scheduled during April.

Sincerely,

A handwritten signature in black ink, appearing to read "T.J. Budge", with a horizontal line extending to the left.

T.J. BUDGE

c: Rob Harris
Paul Arrington
Kent Fletcher