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Attorneys for P4 Production, LLC

RECEIVED
AUG 18 2015
Department of Water Resources
Eastern Region

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

In The Matter Of Application
For Transfer No. 79037 in the Name of P4
Production, LLC

AFFIDAVIT OF MIKE VEILE

STATE OF IDAHO)

County of Caribou)

I, MIKE VEILE, being first duly sworn on his oath deposes and states as follows:

1. I make this affidavit upon personal knowledge and belief.
2. I am currently employed at Monsanto, located at 1853 Highway 34, Soda Springs, Idaho 83276. I have worked at this plant since January of 1998. Currently, I am the Manufacturing Business Unit Lead. Through my employment relationship with Monsanto and through performing my responsibilities therein, I have obtained a personal knowledge of the facts stated herein.

3. The purpose of this affidavit is to make record of new additional evidence that now appears relevant given some of the findings and conclusions made in the August 4, 2015 Preliminary Order not approving the North Wells.

4. Under normal pumping conditions, Well Pump No. 3 at the Monsanto plant supplies the plant needs. Periodically, other pumps augment Well Pump No. In May 2015, the output from Well No. 3 began to decline and eventually became insufficient to meet plant needs. Initially it was unknown whether the cause was a well or mechanical problem, but the eventual cause of the failure proved to be mechanical pump failure. As Well No. 3's output declined and eventually failed, the two backup pumps, Well Pump No. 1 and Well Pump No. 2, were brought on line to meet demands. However, these two

other pumps were unable to meet plant full demands for water. This shortcoming resulted in portions of the operation and subsequent production at the Monsanto plant to be shut down for a full day. Other systems using water were backed down for several days until a new pump could be installed.

5. Neither Well No. 1 nor Well Pump No. 2 is currently meeting rated capacity. At the present time, it is believed that this is due to mechanical deterioration of these pumps. In light of this failure, the age of the pumps and motors and the age of the wells that have been in use since the plan began operations in about 1951, we are in the process of evaluating how to reliably meet water requirements in the future to assure a continuous and adequate supply of water. Drilling one or more new wells is being considered, including the proposed North Wells because of the physical constraints at the plant site. Pump replacement is currently waiting resolution of the transfer application to determine the replacement pump size.

6. The well failure in May has highlighted the critical—as well as tenuous—nature of these pumps and wells, and how integral they are to the operations at Monsanto. Given the immediate and significant impact these wells can present, it is critical to have an alternate option approved to minimize the negative impact on production should another well be needed. The length of time involved in securing approval of a transfer application as we have seen in this proceeding underscores the need to have flexibility on alternative options for well replacement approved and in place in advance.

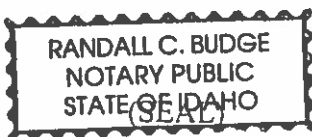
FURTHER YOUR AFFIANT SAYETH NAUGHT.

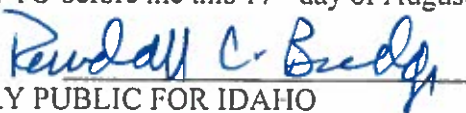
DATED this 17th day of August, 2015.

By:


MIKE VEILE

SUBSCRIBED AND SWORN TO before me this 17th day of August, 2015.




NOTARY PUBLIC FOR IDAHO
Residing at:
My Commission Expires:

CERTIFICATE OF SERVICE

I certify that on this the 18th day of August, 2015, the foregoing document was served on the following persons in the manner indicated.


Signature of person mailing form

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