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Attorneys for Rangen, Inc.

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF THE
APPLICATION FOR PERMIT NOS. 36-
16976 & 36-17002

**NOTICE OF DEPOSITION DUCES
TECUM OF BOB HARDGROVE**

**WEDNESDAY, AUGUST 27, 2014
Time: 10:00 a.m.**

**RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED
101 South Capitol Blvd.
US Bank Plaza, Suite 300
Boise, ID 83702
(208) 395-0011**

TO: BOB HARDGROVE AND IGWA'S COUNSEL OF RECORD

PLEASE TAKE NOTICE that Rangen, Inc. will take the deposition of Bob Hardgrove before a certified Court Reporter, in accordance with the Rules of Civil Procedure of the State of Idaho, on Wednesday, the 27th day of August, 2014, at the hour of 10:00 a.m. at the Offices of Racine, Olson, Nye, Budge & Bailey, Chartered, 101 S. Capitol Blvd., Boise, ID 83702.

The Deponent is further required to identify and bring with him the following documents:

1. Copies of all maps, diagrams, blue prints, photographs, and drawings showing the source of the water for the permit, the point of diversion, the place of use and the proposed alternative pump station.
2. Copies of SPF Water Engineering's entire file related to the above-referenced permit applications, including, but not limited to all reports, rough draft reports, preliminary drawings, sketches, blueprints, memoranda, and notes.
3. Copies of all documents reflecting flow data available for the source of the water including.
4. GIS and CAD data related to the above-referenced permits.
5. Copies of all permit applications prepared and/or submitted in connection with the the above-referenced permits, including application for CAFO permit from Gooding County.
6. Copies of all letters of intent, memoranda of agreement, agreements or other documents which pertain to the above-referenced permits.
7. Copies of all documents pertaining to easements, rights of way, licenses or other agreements allowing access to the source of the water and place of use.

8. Copies of all documents evidencing communications between IGWA/you/SPF and/or IDWR pertaining to the above-referenced permits. This request for documents includes, but is not limited to correspondence, emails, notes of conversations and meeting notes. Rangen is not seeking documents that have been filed by IGWA or IDWR in any cases pending before IDWR or the SRBA or documents to which Rangen is a party.
9. Copies of all documents evidencing communications between IGWA/you/SPF and/or the Idaho Water Resource Board pertaining to the above-referenced permits.
10. Copies of all documents obtained by IGWA/you/SPF from IDWR pertaining to the above-referenced permits or efforts to mitigate Rangen's delivery call. Rangen is not seeking documents filed in connection with any IDWR or SRBA proceedings or any documents to which Rangen was a party.
11. Copies of all documents obtained by IGWA/you/SPF from the State of Idaho or any of its agencies, political subdivisions or representatives pertaining to the above-referenced permits or efforts to mitigate Rangen's delivery call. Rangen is not seeking documents filed in any IDWR or SRBA proceedings or any documents to which Rangen was a party.
12. Copies of all documents pertaining to any condemnation proceedings that may be needed or are contemplated in connection with the above referenced permit filed by IGWA's groundwater districts.

The term "document" as used above includes, but is not limited to, notes (oral or written), memoranda, reports, studies, maps, surveys, plans, drawings, photographs, calculations, spreadsheets and any computer analyses, whether written or electronic in format.

All parties and their counsel are invited to attend. The oral examination will continue from day to day until completed.

DATED this 22 day of August, 2014.

MAY, BROWNING & MAY, PLLC

By: 

J. Justin May

CERTIFICATE OF SERVICE

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the 22 day of August, 2014 he caused a true and correct copy of the foregoing document to be served by email and first class U.S. Mail, postage prepaid upon the following:

Original: James Cefalo Idaho Department of Water Resources 900 N. Skyline Dr., Ste. A Idaho Falls, ID 83402-1718 james.cefalo@idwr.idaho.gov	Hand Delivery ☐ U.S. Mail ☒ Facsimile ☐ Federal Express ☐ E-Mail ☒
Randall C. Budge Thomas J. Budge RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED 201 E. Center St. P.O. Box 1391 Pocatello, ID 83304-1391 rcb@racinelaw.ne <u>tjb@racinelaw.net</u> bjh@racinelaw.net	Hand Delivery ☐ U.S. Mail ☒ Facsimile ☐ Federal Express ☐ E-Mail ☒
Blind Canyon Aquaranch, Inc. c/o Gary Lemmon 2757 South 1050 East Hagerman, ID 83332	Hand Delivery ☐ U.S. Mail ☒ Facsimile ☐ Federal Express ☐ E-Mail ☒
Craig Hobdey P.O. Box 176 Gooding, ID 83330 hobdeycraig@gmail.com	Hand Delivery ☐ U.S. Mail ☒ Facsimile ☐ Federal Express ☐ E-Mail ☒



J. Justin May