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**DEPARTMENT OF
WATER RESOURCES**

Attorneys for Tree Top Ranches, L.P.

BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO

IN THE MATTER OF APPLICATION FOR
PERMIT NO. 63-33507 IN THE NAME OF
G. O. INVESTMENTS IDAHO, LLC

TREE TOP RANCHES, L.P.'S RESPONSES TO
G. O. INVESTMENTS IDAHO, LLC'S FIRST
SET OF DISCOVERY REQUESTS

**I.
GENERAL OBJECTIONS**

Tree Top Ranches, L.P. ("Tree Top") has not yet completed its own investigations and/or discovery. Accordingly, the answers and responses that follow are based upon the best knowledge, information, and belief of Tree Top at this time. Tree Top reserves the right to make any further answers and responses if it appears that any omission or error has been made in connection with these answers and responses or that more accurate information is or has become available. These answers and responses are made without prejudice to Tree Top's rights to use in later discovery or to present at hearing, such evidence as may later be discovered or evaluated.

These answers and responses are made subject to all objections as to competence, relevance, materiality, and admissibility. These answers and responses are subject to all objections that would require the exclusion of any statement, material, or information herein provided if such interrogatory were asked of, or any statement, material, or information provided were made by, witnesses present and testifying in court. All such objections are reserved and may be interposed at the time of hearing.

Tree Top specifically objects to these discovery requests to the extent they seek information protected by the attorney-client privilege, the attorney work product doctrine, and the rules governing the discovery of facts of experts as set forth in Rule 26(b)(4), Idaho Rules of Civil Procedure. This objection is intended to apply to all of the discovery requests that seek such information and will not necessarily be repeated for each request to which it applies. Tree Top has, to the extent possible, construed each request as requesting only information and/or documents not subject to any applicable protection.

No incidental or implied admissions are intended. The fact that Tree Top has responded to any discovery request, or part thereof, should not be taken as an admission that Tree Top accepts that the discovery request or the response or objection thereto constitutes admissible evidence. Tree Top answers to any discovery requests herein do not constitute a waiver of Tree Top's right to object to any future, additional, or supplemental discovery requests regarding the same or similar matter.

II.
ANSWERS TO INTERROGATORIES AND
RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

INTERROGATORY NO. 1: Please set forth the name, address, telephone number, and occupation of each and every individual known to you or your counsel who has

knowledge of or who purports to have knowledge of any of the issues, facts or any occurrences which relate to the subject of this proceeding, and set forth a full and accurate summary of knowledge possessed by such person.

ANSWER TO INTERROGATORY NO. 1:

Scott King; SPF Water Engineering, LLC; 300 East Mallard Drive, Suite 350, Boise, Idaho, 83706. Mr. King is a professional engineer expected to testify regarding the merits of the application for permit, including its evaluation under the statutory criteria provided under Idaho Code Section 42-203A. Mr. King's Curriculum Vitae is attached hereto.

Terry Scanlan; SPF Water Engineering, LLC; 300 East Mallard Drive, Suite 350, Boise, Idaho 83706. Mr. Scanlan is a professional engineer and hydrogeologist who may testify regarding the merits of the application for permit, including its evaluation under the statutory criteria provided under Idaho Code Section 42-203A. Mr. Scanlan's Curriculum Vitae is attached hereto.

Jan Shurte; Idaho Department of Water Resources ("IDWR") State Office; 322 E. Front Street, Boise, Idaho, 83720. Ms. Shurte was an IDWR Water Resource Agent formally involved in the processing and investigation of the above-captioned application for permit.

John Westra, IDWR Western Region Office; 2735 Airport Way, Boise, Idaho, 83705. Mr. Westra is the Manager of the IDWR Western Region Office, and presided over the initial status conferences concerning these contested case proceedings as the interim Hearing Officer.

Rachael Sommer, IDWR Western Region Office; 2735 Airport Way, Boise, Idaho, 83705. Ms. Sommer is an IDWR employee who assisted Mr. Westra in the conduct of the initial status conferences concerning these contested case proceedings.

Shelley Keen, IDWR State Office, 322 E. Front Street, Boise, Idaho 83720. Mr. Keen assumed the Hearing Officer duties in these contested case proceedings from John Westra.

Steve Lester, IDWR Western Region Office; 2735 Airport Way, Boise, Idaho, 83705. Mr. Lester is one of the IDWR Water Rights Supervisors involved in the processing and investigation of the above-captioned application for permit.

Lori Graves; SPF Water Engineering, LLC; 300 East Mallard Drive, Suite 350, Boise, Idaho, 83706. Though Ms. Graves currently works for SPF Water Engineering, Ms. Graves was previously an IDWR water resource agent familiar with winter wildlife applications for permit in the Parma, Idaho area. It is Tree Top's understanding that Ms. Graves assists IDWR as an outside contract consultant with the processing and investigation of all such applications for permit, including those captioned above.

Unknown Individuals; Haas Ditch Co., c/o Barker, Rosholt, & Simpson, LLP, P.O. Box 2139, Boise, Idaho 83701. The Haas Ditch Co. was a protestant in these matters, and it owns, operates, and controls various irrigation structures and works implicated in the diversion and delivery of water proposed by the above-captioned application for permit.

Albert Barker; Barker, Rosholt, & Simpson, LLP, P.O. Box 2139, Boise, Idaho 83701. Mr. Barker served as counsel to the Haas Ditch Co. regarding its protests in this matter. Consequently, Mr. Barker is familiar with the company's ownership, operation, and control of various irrigation structures and works implicated in the diversion and delivery of water proposed by the above-captioned application for permit.

Scott Reinecker; Idaho Fish & Game, 3101 South Powerline Road, Nampa, Idaho 83686. Mr. Reinecker is the Regional Supervisor of the agency's Southwest Region, who issued correspondence to IDWR, dated March 28, 2012, expressing concern over the above-captioned

application for permit, questioning in particular the purported wildlife benefit supported by the applications.

Larry Williams; c/o Moffatt Thomas Barrett Rock & Fields, Chtd., P.O. Box 829, Boise, Idaho, 83701. Mr. Williams is a partner in Tree Top Ranches, L.P., which owns the majority of what is commonly known as McConnel Island. Therefore, Mr. Williams is familiar with Tree Top's protests in this matter and is concerned that the application, if approved absent sufficient conditioning, could adversely impact the health and integrity of the westerly channel of the Boise River flowing around the island, and the wildlife habitat that the channel already naturally provides.

William J. Mulder; c/o Moffatt Thomas Barrett Rock & Fields, Chtd., P.O. Box 829, Boise, Idaho, 83701. Mr. Mulder is the Property Manager of Tree Top Ranches, L.P., which owns the majority of what is commonly known as McConnel Island. Therefore, Mr. Mulder is familiar with Tree Top's protests in this matter and concerned that the application, if approved absent sufficient conditioning, could adversely impact the health and integrity of the westerly channel of the Boise River flowing around the island, and the wildlife habitat that the channel already naturally provides.

Bill Seward; c/o Moffatt Thomas Barrett Rock & Fields, Chtd., P.O. Box 829, Boise, Idaho, 83701. Mr. Seward is the Ranch Manager of Tree Top's Parma Ranch (from 2007 to present), which includes the McConnel Island land mass. Therefore, Mr. Seward is familiar with Tree Top's protests in this matter and concerned that the application, if approved absent sufficient conditioning, could adversely impact the health and integrity of the westerly channel of the Boise River flowing around the island, and the wildlife habitat that the channel already naturally provides.

Kelly Yore; c/o Moffatt Thomas Barrett Rock & Fields, Chtd., P.O. Box 829, Boise, Idaho 83701. Mr. Yore is the former Ranch Manager of Tree Top's Parma Ranch immediately preceding Bill Seward (from 2004-2007). Mr. Yore, therefore, is familiar with the McConnel Island land mass and the flow regime of the westerly channel of the Boise River flowing around the island.

Greg Obendorf, Manager, G. O. Investments Idaho, LLC; c/o Hofstetter Law Office, 608 W. Franklin Street, Boise, Idaho, 83702. Mr. Obendorf is one of the managers of applicant G. O. Investments Idaho, LLC, and he presumably knows the details of the application and all aspects (elements) of the requested water right, its proposed diversion and conveyance infrastructure, and its place of use.

Ray Obendorf, Manager, G. O. Investments Idaho, LLC; c/o Hofstetter Law Office, 608 W. Franklin Street, Boise, Idaho, 83702. Mr. Obendorf is one of the managers of applicant G. O. Investments Idaho, LLC, and he presumably knows the details of the application and all aspects (elements) of the requested water right, its proposed diversion and conveyance infrastructure, and its place of use.

INTERROGATORY NO. 2: Please set forth the name, address, telephone number, and occupation of each person you may call as a witness at the hearing in this proceeding, and for each such witness, state the substance of his/her expected testimony.

ANSWER TO INTERROGATORY NO. 2: Tree Top has yet to determine who it will call as a witness at the hearing of this matter, and this answer will be supplemented accordingly when such a decision is made. In the meantime, however, Tree Top reserves the right to call any of the individuals identified in its Answer to Interrogatory No. 1, above, and any individuals identified by applicant G. O. Investments Idaho, LLC.

INTERROGATORY NO. 3: Please identify each person whom you have consulted as an expert in connection with this proceeding and please identify each person whom you may call as an expert witness at the hearing in this proceeding and state the subject matter on which such expert witness is expected to testify, the substance of the facts to which such expert witness is expected to testify and the substance of the opinions to which such expert witness is expected to testify as required by Rule 26(b)(4) of the applicable Rules of Civil Procedure, the basis and reasons therefore, the data and other information considered in forming the opinions, and any exhibits to be used as a summary of or support for the opinions, together with all of the underlying facts and data as required by Rule 705 of the applicable Rules of Evidence.

ANSWER TO INTERROGATORY NO. 3: Objection. Tree Top objects to this Interrogatory on the grounds and to the extent that it seeks information protected by the attorney-client-privilege and/or the work product doctrine, including seeking the disclosure of facts known and opinions held by consulting expert witnesses in derogation of Rule 26(b)(4)(B). Subject to and without waiving said objections, Tree Top identifies Scott King and Terry Scanlan of SPF Water Engineering (please see Answer to Interrogatory No. 1, above). Mr. King and/or Mr. Scanlan will testify in conformance with the report dated September 26, 2013, titled: *Expert Witness Report Supporting Application for Permit No. 63-32462 And Protests Against Applications for Permit 63-32459, 63-32460, 63-33507 & 63-33508*. Said report was previously disclosed to applicant via Tree Top's Notice of Service of Expert Reports, dated the same.

INTERROGATORY NO. 4: Please identify each person with whom you or your representatives have communicated seeking information which in any way relates to the subject of this proceeding.

ANSWER TO INTERROGATORY NO. 4: Objection. Tree Top objects to this Interrogatory on the grounds and to the extent that it seeks information protected by the attorney-client-privilege and/or the work product doctrine, including seeking the disclosure of facts known and opinions held by consulting expert witnesses in derogation of Rule 26(b)(4)(B). Subject to and without waiving said objections, Tree Top has communicated with Scott King and Terry Scanlan of SPF Water Engineering, Dana Hofstetter of Hofstetter Law Office, Al Barker of Barker, Rosholt, & Simpson, LLP, Mike Creamer of Givens Pursley, LLP, John Westra of IDWR, Shelley Keen of IDWR, and Jerry Deal of the Idaho Department of Fish & Game.

INTERROGATORY NO. 5: Please identify each person who supplied answers to these interrogatories and designate the answers or answer or part thereof supplied by such person. (This interrogatory is intended to discover principal sources of information and does not seek to ascertain the identity of mere draftsmen or persons responsible for the mechanical preparation of these answers.).

ANSWER TO INTERROGATORY NO. 5: Objection. Tree Top objects to this Interrogatory on the grounds and to the extent that it seeks information protected by the attorney-client-privilege and/or the work product doctrine, including seeking the disclosure of facts known and opinions held by consulting expert witnesses in derogation of Rule 26(b)(4)(B). Subject to and without waiving said objections, Bill Mulder of Tree Top Ranches, L.P., Scott King of SPF Water Engineering, and Andrew J. Waldera of Moffatt, Thomas, Barrett, Rock & Fields, Chtd.

INTERROGATORY NO. 6: Please separately identify each communication which in any way relates to the subject of this proceeding or which you may offer in evidence at the trial of this action. For each such communication please identify:

- (a) Whether the communication was oral or written
- (b) Who were the parties to the communication
- (c) The date of the communication
- (d) The substance of the communication
- (e) The relevance of the communication to the issues in this

proceeding.

ANSWER TO INTERROGATORY NO. 6: Objection. Tree Top objects to this interrogatory on the grounds and to the extent that it seeks information protected by the attorney-client privilege and/or the work product doctrine. Subject to and without waiving said objections, Tree Top has yet to determine what items (including communications) it may offer into evidence at the hearing in this matter. Tree Top will, therefore, supplement this answer accordingly.

In the meantime, Tree Top does anticipate entering the report dated September 26, 2013, titled: *Expert Witness Report Supporting Application for Permit No. 63-32462 And Protests Against Applications for Permit 63-32459, 63-32460, 63-33507 & 63-33508*, referenced in Answer to Interrogatory No. 3, above. Tree Top further reserves the right to offer into evidence all documents identified herein or attached hereto. Tree Top also reserves the right to offer all documents maintained in the files of IDWR (commonly referred to as “backfiles”) in relation to the above-captioned application for permit.

REQUEST FOR PRODUCTION NO. 1: Please produce a copy of each and every written communication identified in your answer to Interrogatory No. 6.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Please see Answer to Interrogatory No. 6, above, the attached report dated September 26, 2013, titled: *Expert Witness*

Report Supporting Application for Permit No. 63-32462 And Protests Against Applications for Permit 63-32459, 63-32460, 63-33507 & 63-33508, and the attached documents.

INTERROGATORY NO. 7: Please separately identify each document, picture, and sound recording which in any way relates to the subject of this proceeding, and explain its significance.

ANSWER TO INTERROGATORY NO. 7: Objection. Tree Top objects to this interrogatory on the grounds and to the extent that it seeks information protected by the attorney-client privilege, the work product doctrine (including the mental impressions of counsel regarding the “significance” of an item), and/or information protected by Rule 26(b)(4)(B). Subject to and without waiving said objections, please see that attached report dated September 26, 2013, titled: *Expert Witness Report Supporting Application for Permit No. 63-32462 And Protests Against Applications for Permit 63-32459, 63-32460, 63-33507 & 63-33508.* The report speaks for itself and expresses concern over the adverse impacts that additional water diversions under the subject applications may have on the integrity of the westerly channel of the Boise River flowing around McConnel Island, and the wildlife habitat that channel supports.

Please also see the attached emails between Scott King and Andy Waldera, dated November 11, 2013 and November 26, 2013, respectively. The November 26 email in particular demonstrates the significant flows in the westerly channel when the same is not impeded by water diversions and related diversion infrastructure.

Please also see the attached documents, which speak for themselves.

REQUEST FOR PRODUCTION NO. 2: Please produce copies of each and every document, picture and sound recording identified in your answer to Interrogatory No. 7.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: Please see Answer to Interrogatory No. 7.

INTERROGATORY NO. 8: Please identify each exhibit which you may offer into evidence at the hearing in this proceeding, the fact or facts intended to be proved by the use of the exhibit or the relevance of which is felt to justify the use of the exhibit and as to each such exhibit which consists of more than 15 pages or more than 3,000 words, quote or otherwise specifically designate each portion of such exhibit which you contend is the relevant portions thereof.

ANSWER TO INTERROGATORY NO. 8: Please see Answer to Interrogatory Nos. 6 and 7.

REQUEST FOR PRODUCTION NO. 3: Please produce a copy of each and every exhibit identified in your answer to Interrogatory No. 8.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: Please see Answer to Interrogatory Nos. 6 and 7.

INTERROGATORY NO. 9: Please identify each statement made by anyone on your behalf, oral or written, which relates to any of the facts, issues or occurrences pertaining to this proceeding. For each such statement please identify:

- (a) Whether the statement was oral or written.
- (b) Who made the statement.
- (c) The person to whom the statement was made.
- (d) The date of the statement.
- (e) The substance of the statement.
- (f) The relevance of the statement to the issues in this case.

ANSWER TO INTERROGATORY NO. 9: Please see Answer to Interrogatory Nos. 6 and 7.

REQUEST FOR PRODUCTION NO. 4: Please produce a copy of each and every written statement identified in your answer to Interrogatory No. 9.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: Please see Answer to Interrogatory Nos. 6 and 7.

INTERROGATORY NO. 10: If you contend that G. O. or any agent, predecessors in interest or other person who could make an admission binding on them has admitted a fact material to your position with respect to the subject of this proceeding, please identify who made each admission, what the admission is and whether there are any documents which purport to reflect that an admission occurred.

ANSWER TO INTERROGATORY NO. 10: Tree Top is not presently aware of any such admissions against interest with the exception that counsel for the applicant has conveyed on various occasions that the applicant has no desire or interest in dewatering the westerly channel of the Boise River flowing around McConnel Island. Counsel for the applicant also reports that the above-captioned application for permit will claim an adjusted quantity of water; the quantity originally sought (24 cfs) will be adjusted downward to 6 cfs as required by a separate settlement agreement reached between the applicant and the Haas Ditch Company.

REQUEST FOR PRODUCTION NO. 5: Please produce all documents that you assert support or may support your position with respect to the subject of this proceeding.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Please see the attached documents.

INTERROGATORY NO. 11: Please describe (as defined above) the basis for the statement “Protestant is concerned that the diversion of additional Boise River water into drainageway serving the Haas Ditch point of diversion during the irrigation season can de-water the westerly Boise River channel flowing around McConnell Island thereby threatening existing wildlife habitat on and around the island” in the Protest.

ANSWER TO INTERROGATORY NO. 11: Please see the attached documents. As demonstrated by the November 26, 2013 email between Scott King and Andy Waldera the westerly (or southerly, in the parlance of the email) channel of the Boise River flowing around McConnell Island conveys significant flows when unimpeded by water diversions and related infrastructure. On November 26, 2013 the flow in the channel measured 68 cfs, or approximately 10% of the river’s mainstem flow. During the irrigation season, the channel’s flow can be as little as 5 to 8 cfs absent diversions under the pending applications for permit (nos. 63-33507 and 63-33508). The water rights proposed under the pending applications for permit will place further demand for diversion of water present at or near the head end of the Boise River channel of concern. This additional diversion demand threatens to further dewater the river channel and the wildlife habitat it provides.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents relating in any way to your answer to Interrogatory No. 11.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Please see the attached documents.

INTERROGATORY NO. 12: Please describe (as defined above) the basis for the statement “Increasing diversions from the westerly McConnell Island channel also threatens to

stagnate the channel thereby threatening the integrity of the channel and promoting the growth of nuisance vegetation” in the Protest.

ANSWER TO INTERROGATORY NO. 12: Please see Answer to Interrogatory No. 11, above. Increased water diversions can decrease the water that would otherwise be available to flow into the river channel of concern.

REQUEST FOR PRODUCTION NO. 7: Please produce all documents relating in any way to your answer to Interrogatory No. 12.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: Please see the attached documents.

INTERROGATORY NO. 13: If you contend that the proposed use of water under the Application will reduce the quantity of water under existing water rights, please describe all expected testimony and identify all documents which support or relate to such contention.

ANSWER TO INTERROGATORY NO. 13: Tree Top’s pending protests to Application for Permit Nos. 63-33507 and 63-33508 do not raise concern over whether the proposed water rights will reduce the quantity of water available to existing water rights in the locale. Instead, the crux of Tree Top’s protests is that the proposed water rights will likely reduce the quantity of water that would otherwise be available to flow through the westerly channel of the Boise River around McConnel Island. Decreased flow of water in the channel threatens the health and integrity of the channel, and the wildlife habitat the channel naturally provides.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents relating in any way to your answer to Interrogatory No. 13.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8: Please see the attached documents.

INTERROGATORY NO. 14: If you contend that the water supply is insufficient for the proposed use of water under the Application, please describe all expected testimony and identify all documents which support or relate to such contention.

ANSWER TO INTERROGATORY NO. 14: Please see Answer to Interrogatory Nos. 11 and 13, above. Westerly channel flows can be as little as 5 to 8 cfs during the irrigation season based on current water demands. Application for Permit Nos. 63-33507 and 63-33508 seek to divert 6 cfs from the Boise River near the head of the westerly channel via the use of the Haas Ditch Company diversion works and ditch, and 6 cfs from the a drain commonly referred to as the Baldrige Meadows Drain, a/k/a the Baldwin Drain, a/k/a the Meadows Drain tributary to the Boise River near the head of the westerly channel, respectively. These water diversions threaten to reduce flows in the westerly channel, thereby raising the question whether the sources of water are sufficient to meet the applied-for demand without jeopardizing the integrity and health of the Boise River channel.

REQUEST FOR PRODUCTION NO. 9: Please produce all documents relating in any way to your answer to Interrogatory No. 14.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9: Please see the attached documents.

INTERROGATORY NO. 15: If you contend that the Application is not made in good faith, is made for delay or speculative purposes, please describe all expected testimony and identify all documents which support or relate to such contention.

ANSWER TO INTERROGATORY NO. 15: Tree Top's protests do not make this contention.

REQUEST FOR PRODUCTION NO. 10: Please produce all documents relating in any way to your answer to Interrogatory No. 15.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10: Not applicable.

INTERROGATORY NO. 16: If you contend that the Applicant does not have sufficient financial resources to complete the work involved in the Application, please describe all expected testimony and identify all documents which support or relate to such contention.

ANSWER TO INTERROGATORY NO. 16: Tree Top's protests do not make this contention.

REQUEST FOR PRODUCTION NO. 11: Please produce all documents relating in any way to your answer to Interrogatory No. 16.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11: Not applicable.

INTERROGATORY NO. 17: If you contend that the proposed use of water under the Application will conflict with the local public interest, please describe all expected testimony and identify all documents which support or relate to such contention.

ANSWER TO INTERROGATORY NO. 17: Please see Answer to Interrogatory Nos. 6, 7, 11, 12, 13, and 14, above.

REQUEST FOR PRODUCTION NO. 12: Please produce all documents relating in any way to your answer to Interrogatory No. 17.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12: Please see the attached documents.

INTERROGATORY NO. 18: If you contend that the proposed use of water under the Application is contrary to conservation of water resources within the state of Idaho, please describe all expected testimony and identify all documents which support or relate to such contention.

ANSWER TO INTERROGATORY NO. 18: Please see Answer to Interrogatory Nos. 6, 7, 11, 12, 13, and 14, above. If approved, and absent sufficient conditioning, the applications for permit could further reduce flows in the westerly Boise River channel flowing around McConnel Island. The river channel is a naturally occurring feature according to USGS maps, and it makes little sense to Tree Top to threaten the health and integrity of a natural water feature (and the wildlife habitat it already provides) with an attempt to replace that habitat in roughly the same locale via an artificial (manmade) construct that may, or may not, prove successful.

REQUEST FOR PRODUCTION NO. 13: Please produce all documents relating in any way to your answer to Interrogatory No. 18.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13: Please see the attached documents.

INTERROGATORY NO. 19: If you contend that the Application does not comply with applicable statutes and regulations, please describe all expected testimony and identify all documents which support or relate to such contention.

ANSWER TO INTERROGATORY NO. 19: Please see Answer to Interrogatory Nos. 6, 7, 11, 12, 13, 14, and 18, above, together with the documents attached hereto.

REQUEST FOR PRODUCTION NO. 14: Please produce all documents relating in any way to your answer to Interrogatory No. 19.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14: Please see Answer to Interrogatory No. 19.

INTERROGATORY NO. 20: Please describe with detail any arguments that you might raise in this matter that are not specifically described in any of your answers to the Interrogatories above.

ANSWER TO INTERROGATORY NO. 20: Not applicable.

REQUEST FOR PRODUCTION NO. 15: Please produce all documents relating in any way to your answer to Interrogatory No. 20.

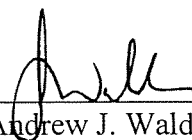
RESPONSE TO REQUEST FOR PRODUCTION NO. 15: Not applicable.

REQUEST FOR PRODUCTION NO. 16: Please produce a copy of any report or written opinion issued by the experts you identified in your answer to Interrogatory No. 3 and a curriculum vitae or resume of each such expert.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16: Please see the attached expert report, titled: *Expert Witness Report Supporting Application for Permit No. 63-32462 And Protests Against Applications for Permit 63-32459, 63-32460, 63-33507 & 63-33508*, emails dated November 11 and November 26, 2013, and the attached CVs.

DATED this 22nd day of April, 2014.

MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED

By 
Andrew J. Waldera – Of the Firm
Attorneys for Tree Top Ranches, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of April, 2014, I caused the foregoing **TREE TOP RANCHES, L.P.'S RESPONSES TO G. O. INVESTMENTS IDAHO, LLC'S FIRST SET OF DISCOVERY REQUESTS** to be served by the method indicated below, and addressed to the following:

Director
IDAHO DEPARTMENT OF WATER RESOURCES
322 E. Front Street
P.O. Box 83720
Boise, ID 83720-0098

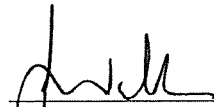
- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile

Dana Hofstetter
HOFSTETTER LAW OFFICE
608 W. Franklin Street
Boise, ID 83702

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile

Lori Graves
SPF WATER ENGINEERING, LLC
300 E. Mallard Drive, Suite 350
Boise, ID 83706

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile



Andrew J. Waldera