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June 17, 2011

Re: *In the Matter of Application for Transfer No. 76779 in the Name of the City of Pocatello*

Dear Counsel and Protestants:

Enclosed is a CD containing data files related to the City of Pocatello's Expert Report of Greg Sullivan, Spronk Water Engineers that was served on you last week. These files include an Excel spreadsheet for the Chesterfield Reservoir Operations Model described in the Expert Report as well as additional tables and spreadsheets reviewed or relied on by Mr. Sullivan in connection with Expert Report and the inputs to the Model.

Also enclosed are revised Tables 7, 8 and 9 (Bates Nos. POCATELLO00843-845) which are to be substituted for the those tables in the Expert Report. Tables 7, 8 and 9 in the Expert Report you received contained topographical errors that are corrected in the enclosed substitute tables.

This production supplements the City's prior responses to the Interrogatories and Requests for Production served on the City by the Surface Water Coalition and Portneuf Watershed Users Association requesting disclosure of the basis and facts for any opinions of the City's disclosed expert witnesses.

Sincerely,


 Michael C. Creamer

MCC:ch
 Enclosures
 cc **James Cefalo (w/enc.)**
 5902-6_1191544_1.DOC

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5902-6_1191561_1.DOC

Attorneys for Applicant City of Pocatello

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

**IN THE MATTER OF APPLICATION
FOR TRANSFER NO. 76779 IN THE
NAME OF THE CITY OF POCATELLO**

AFFIDAVIT OF SERVICE

STATE OF IDAHO)
) ss.
COUNTY OF ADA)

I, Michael C. Creamer, being first duly sworn, depose and say:

On the 17th day of June, 2011, a CD containing data files related to the *City of Pocatello's Expert Report of Greg Sullivan, Spronk Water Engineers* and revised Tables 7, 8 and 9 (Bates Nos. POCATELLO00843-845) were filed with the Department and served on the parties by the method indicated below, on the following:

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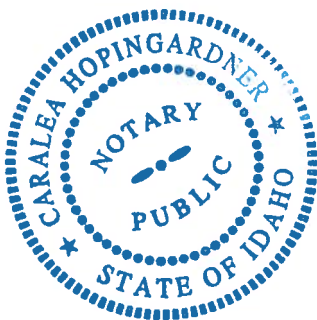
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Michael C. Creamer

SUBSCRIBED AND SWORN to before me this 17th day of June, 2011.





Notary Public for the State of Idaho
Residing at Boise, Idaho
My commission expires 5/21/2016

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of June, 2011, a true and correct copy of the foregoing was served upon the following individual(s) by the means indicated:

Original Filed With:

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Michael C. Creamer

Table 7

**Summary of Results
from Pocatello's Transfer of Chesterfield Reservoir Storage
Chesterfield Reservoir Operations Model
*100% Municipal Use***

Selected Input Parameters

PMVCC Irrigation Use		City of Pocatello Use	
Irrigated Area (ac)	5,103	Reservoir Use (af)	3100
Conveyance Loss	30%	Municipal Use (% total)	100%
Farm Irrigation Efficiency	85%	Raw Irrigation Use (% total)	0%
Demand Factor	15%	In-Stream Use (% total)	0%
		Indoor Returns	90%
		Irrigation Returns	20%

Average Annual Results (af)

	Pre- Transfer	Post- Transfer	Average Change	Average Effect ⁽²⁾
Diversions to Storage	6,953	7,186	233	142
Releases from Storage				
To PMVCC	7,236	4,365	-2,871	
To Pocatello	0	3,080	3,080	
Total	7,236	7,444	208	
Consumptive Use of Storage				
PMVCC	4,919	3,434	-1,485	
Pocatello	0	1,502	1,502	
Total	4,919	4,936	17	
Returns of Storage Water				
PMVCC	2,603	1,570	-1,033	
Pocatello	0	1,578	1,578	
Total	2,603	3,148	545	272
Annual Depletions⁽¹⁾	4,350	4,038	-312	-130 (Net Benefit)

Notes

- (1) Depletions = Diversions to Storage minus Returns of Storage Water
 (2) Positive Effect = Increase in depletions; decrease in supply resulting in an impact to downstream users.
 Negative Impact = Decrease in depletions; increase in supply resulting in a benefit to downstream users.

Simulated Chesterfield Reservoir Contents (af)

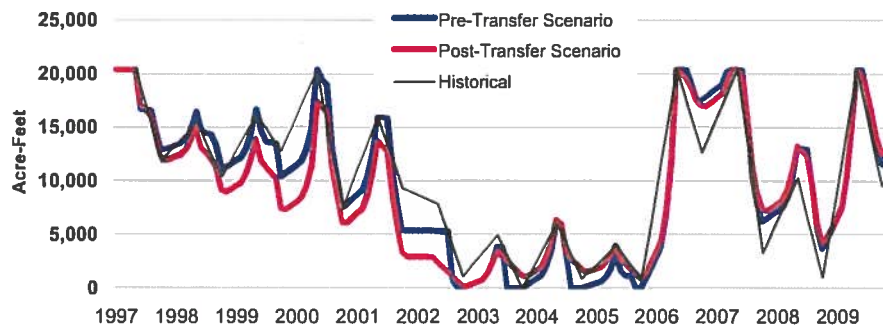


Table 8
Summary of Results
from Pocatello's Transfer of Chesterfield Reservoir Storage
Chesterfield Reservoir Operations Model
100% Irrigation Use

Selected Input Parameters

PMVCC Irrigation Use		City of Pocatello Use	
Irrigated Area (ac)	5,103	Reservoir Use (af)	3100
Conveyance Loss	30%	Municipal Use (% total)	0%
Farm Irrigation Efficiency	85%	Raw Irrigation Use (% total)	100%
Demand Factor	15%	In-Stream Use (% total)	0%
		Indoor Returns	90%
		Irrigation Returns	20%

Average Annual Results (af)

	Pre- Transfer	Post- Transfer	Average Change	Average Effect ⁽²⁾
Diversions to Storage	6,953	7,159	206	134
Releases from Storage				
To PMVCC	7,236	4,606	-2,630	
To Pocatello	0	2,853	2,853	
Total	7,236	7,459	223	
Consumptive Use of Storage				
PMVCC	4,919	3,656	-1,264	
Pocatello	0	2,282	2,282	
Total	4,919	5,938	1,019	
Returns of Storage Water				
PMVCC	2,603	1,657	-946	
Pocatello	0	571	571	
Total	2,603	2,228	-376	-219
Annual Depletions⁽¹⁾	4,350	4,931	582	353 (Net Impact)

Notes

- (1) Depletions = Diversions to Storage minus Returns of Storage Water
(2) Positive Effect = Increase in depletions; decrease in supply resulting in an impact to downstream users.
Negative Impact = Decrease in depletions; increase in supply resulting in a benefit to downstream users.

Simulated Chesterfield Reservoir Contents (af)

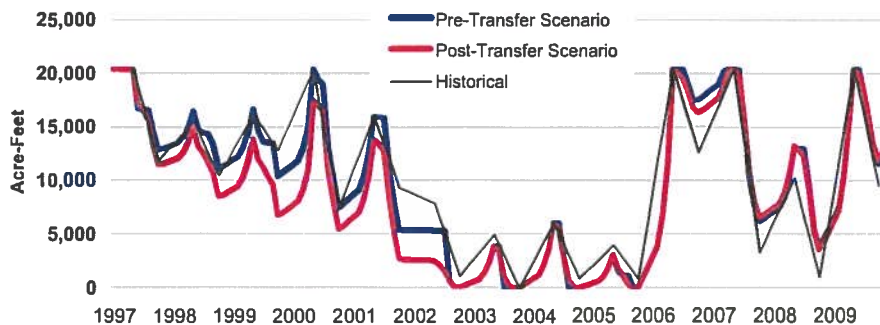


Table 9

Summary of Results
from Pocatello's Transfer of Chesterfield Reservoir Storage
Chesterfield Reservoir Operations Model
100% ARW Use

Selected Input Parameters

PMVCC Irrigation Use		City of Pocatello Use	
Irrigated Area (ac)	5,103	Reservoir Use (af)	3100
Conveyance Loss	30%	Municipal Use (% total)	0%
Farm Irrigation Efficiency	85%	Raw Irrigation Use (% total)	0%
Demand Factor	15%	In-Stream Use (% total)	100%
		Indoor Returns	90%
		Irrigation Returns	20%

Average Annual Results (af)

	Pre-Transfer	Post-Transfer	Average Change	Average Effect ⁽²⁾
Diversions to Storage	6,953	7,186	233	142
Releases from Storage				
To PMVCC	7,236	4,365	-2,871	
To Pocatello	0	3,080	3,080	
Total	7,236	7,444	208	
Consumptive Use of Storage				
PMVCC	4,919	3,434	-1,485	
Pocatello	0	0	0	
Total	4,919	3,434	-1,485	
Returns of Storage Water				
PMVCC	2,603	1,570	-1,033	
Pocatello	0	3,080	3,080	
Total	2,603	4,650	2,047	1,054
Annual Depletions⁽¹⁾	4,350	2,536	-1,814	-912 (Net Benefit)

Notes

- (1) Depletions = Diversions to Storage minus Returns of Storage Water
 (2) Positive Effect = Increase in depletions; decrease in supply resulting in an impact to downstream users.
 Negative Impact = Decrease in depletions; increase in supply resulting in a benefit to downstream users.

Simulated Chesterfield Reservoir Contents (af)

