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SEP 19 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
601 West Bannock Street
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S GENERAL SUPPLEMENTAL DISCOVERY RESPONSE #4**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon all Protestants a true and correct copy of UWID's General Supplemental Discovery Response #4 by mailing the same to their counsel of record as indicated on the attached certificate of service.

Respectfully submitted this 18th day of September 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

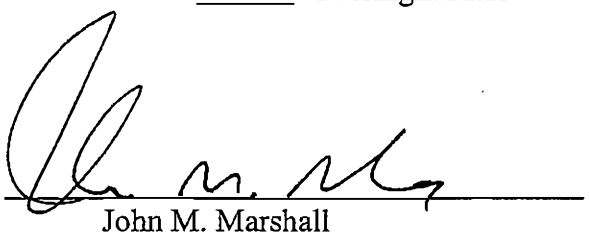
Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail ____ E-mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail



John M. Marshall

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GIVENS PURSLEY LLP

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Emily A. MacMaster
Kimberly D. Maloney
John M. Marshall
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Kelly Greene McConnell
Cynthia A. Melillo
Christopher H. Meyer
Kendall L. Miller
L. Edward Miller
Patrick J. Miller
Judson B. Montgomery
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H. Barton Thomas
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Robert B. White

Raymond D. Givens
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OF COUNSEL

John A. Miller, LL.M. *
TAX CONSULTANT

*Licensed in Kentucky only

September 5, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of UWID's Notice of Service of UWID's General Supplemental Discovery Response #3. Please conform the copy return it to our office in the enclosed self-addressed, stamped envelope.

Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing NOS for 3rd General Supp Resp.DOC

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John M. Marshall, Esq. (Idaho Bar No. 5628)
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Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S GENERAL SUPPLEMENTAL DISCOVERY RESPONSE #3**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon all Protestants a true and correct copy of UWID's General Supplemental Discovery Response #3 by mailing the same to their counsel of record as indicated on the attached certificate of service.

Respectfully submitted this 5th day of September 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

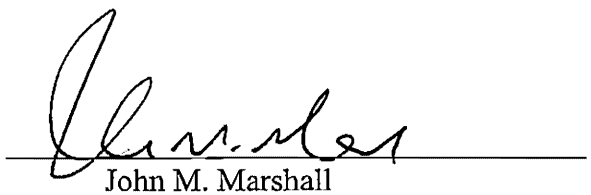
Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail ____ E-mail
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John M. Marshall

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OF COUNSEL

John A. Miller, LL.M. *
TAX CONSULTANT

*Licensed in Kentucky only

August 29, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of each of the following documents:

1. UWID's Notice of Service of UWID's First Supplemental Responses to the First Discovery Requests to United Water from Boise Project Board of Control, Boise-Kuna, Wilder, and Big Bend Irrigation District; and

2. UWID's Notice of Service of UWID's General Supplemental Response #2.

Please conform the copy of each document and return them to our office in the enclosed self-addressed, stamped envelope. Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing NOS - Supp Resp & Genl #2.DOC

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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S GENERAL SUPPLEMENTAL DISCOVERY RESPONSE #2**

On behalf of Applicant United Water Idaho Inc., I, Christopher H. Meyer of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon all Protestants a true and correct copy of UWID's General Supplemental Discovery Response #2 by mailing the same to their counsel of record as indicated on the attached certificate of service.

Respectfully submitted this 29th day of August 2003.

GIVENS PURSLEY LLP

By: Christopher H. Meyer

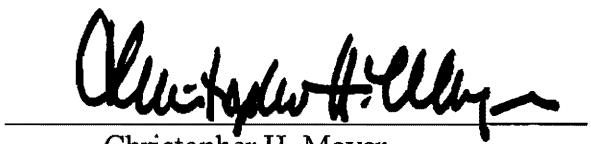
Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail ____ E-mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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Christopher H. Meyer

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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

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BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S FIRST SUPPLEMENTAL RESPONSES TO THE FIRST DISCOVERY REQUESTS TO UNITED WATER FROM BOISE PROJECT BOARD OF CONTROL, BOISE-KUNA, WILDER, AND BIG BEND IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestants Boise Project Board of Control, Boise-Kuna, Wilder, and Big Bend Irrigation District a true and correct copy of UWID's First Supplemental Responses to the First Discovery Request to United Water from Boise Project Board of Control, Boise-Kuna, Wilder, and Big Bend Irrigation District by mailing the same to their counsel of record: Albert P. Barker, Barker Rosholt & Simpson, P.O. Box 2139, Boise, ID 83701-2139 and Robert W. Talboy, Ellsworth, Kallas & Talboy, PLLC, 2402 West Jefferson Street, Boise, ID 83702.

Respectfully submitted this 29th day of August 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

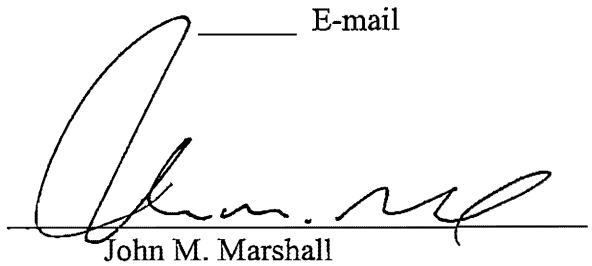
Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail ____ E-mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail ____ E-mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	x U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail ____ E-mail
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	x 	U.S. Mail Facsimile Hand Delivery Overnight Mail E-mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	x 	U.S. Mail Facsimile Hand Delivery Overnight Mail E-mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	x 	U.S. Mail Facsimile Hand Delivery Overnight Mail E-mail



John M. Marshall

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Counsel for Applicant United Water Idaho Inc.

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BEFORE THE
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IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S RESPONSES TO THE FIRST DISCOVERY REQUESTS TO UNITED WATER FROM BOISE PROJECT BOARD OF CONTROL, BOISE-KUNA, WILDER, AND BIG BEND IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestants Boise Project Board of Control, Boise-Kuna, Wilder, and Big Bend Irrigation District a true and correct copy of UWID's Responses to the First Discovery Request to United Water from Boise Project Board of Control, Boise-Kuna, Wilder, and Big Bend Irrigation District by mailing the same to their counsel of record: Albert P. Barker, Barker Rosholt & Simpson, P.O. Box 2139, Boise, ID 83701-2139 and Robert W. Talboy, Ellsworth, Kallas & Talboy, PLLC, 2402 West Jefferson Street, Boise, ID 83702.

Respectfully submitted this 28th day of August 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	x U.S. Mail _____ Hand Delivery _____ Overnight Mail _____ E-mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail _____ E-mail
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2402 West Jefferson Street
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x U.S. Mail
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Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

x U.S. Mail
_____ Facsimile
_____ Hand Delivery
_____ Overnight Mail
_____ E-mail

John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: 208-388-1200
Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
AUG 25 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S RESPONSES TO PIONEER IRRIGATION DISTRICT AND SETTLERS IRRIGATION DISTRICT'S THIRD SET OF DISCOVERY REQUESTS TO UNITED WATER IDAHO INC.**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestants Pioneer Irrigation District and Settlers Irrigation District the original of UWID's Responses to Pioneer Irrigation District and Settlers Irrigation District's Third Set of Discovery Requests to United Water Idaho Inc. mailing the same to their counsel of record: Scott L. Campbell, Moffatt Thomas Barrett Rock & Fields, Chtd., 101 S. Capitol Blvd., 10th Floor, P.O. Box 829, Boise, Idaho 83701-0829

Respectfully submitted this 22nd day of August, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

John M. Marshall

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John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
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Office: 208-388-1200
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
AUG 25 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S GENERAL SUPPLEMENTAL DISCOVERY RESPONSE #1**

On behalf of Applicant United Water Idaho Inc., I, Christopher H. Meyer of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon all Protestants a true and correct copy of UWID's General Supplemental Discovery Response #1 by mailing the same to their counsel of record as indicated on the attached certificate of service.

Respectfully submitted this 22nd day of August 2003.

GIVENS PURSLEY LLP

By: Christopher H. Meyer

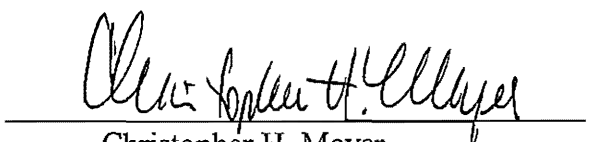
Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	x U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail



Christopher H. Meyer

RECEIVED
AUG 25 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: 208-388-1200
Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S FIRST SUPPLEMENTAL RESPONSE TO PROTESTANT BUREAU OF RECLAMATION'S FIRST SET OF DISCOVERY REQUESTS TO UNITED WATER IDAHO**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant the Bureau of Reclamation a true and correct copy of UWID's First Supplemental Response to Protestant Bureau of Reclamation's First Set of Discovery Requests to United Water Idaho by mailing the same to their counsel of record: Kathleen Marion Carr, U.S. Department of the Interior, 550 West Fort Street, MSC 020, Boise, Idaho 83724-0020 and E. Gail McGarry, Pacific Northwest Region, U.S. Bureau of Reclamation, 1150 N. Curtis Road, Boise, ID 83706-1234

Respectfully submitted this 22nd day of August 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

John M. Marshall

RECEIVED
AUG 19 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
601 West Bannock Street
P.O. Box 2720
Boise, Idaho 83701-2720
Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AMENDED NOTICE OF DEPOSITION DUCES TECUM OF PIONEER IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 3rd day of September 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 601 West Bannock Street, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Pioneer Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

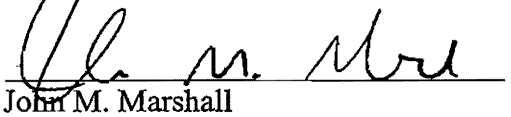
1. Each and every basis for Pioneer Irrigation District's protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 18th day of August 2003.

GIVENS PURSLEY LLP

By 

John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

__X__ U.S. Mail
_____ Facsimile
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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
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GIVENS PURSLEY LLP
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Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
AUG 19 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AMENDED NOTICE OF DEPOSITION DUCES TECUM OF SETTLERS IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 4th day of September 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 601 West Bannock Street, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Settlers Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 18th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
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Moore, Smith, Buxton & Turcke, Chtd.
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Boise City Attorney's Office
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Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail



John M. Marshall

GIVENS PURSLEY LLP

RECEIVED
AUG 14 2003
Department of Water Resources

LAW OFFICES
601 W. Bannock
PO Box 2720, Boise, Idaho 83701
TELEPHONE: 208 388-1200
FACSIMILE: 208 388-1300
WEBSITE: www.givenspursley.com

Gary G. Allen
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Jessica M. Borup
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Michael C. Creamer
Thomas E. Dvorak
Roy Lewis Eiguren
Timothy P. Feamside
Jeffrey C. Fereday
Steven J. Hippler
Karl T. Klein
Debora K. Kristensen
Anne C. Kunkel
Franklin G. Lee
David R. Lombardi
D. David Lorello, Jr.
Emily A. Mackinster
Kimberly D. Maloney
John M. Marshall
Kenneth R. McClure
Kelly Greene McConnell
Cynthia A. Melillo
Christopher H. Meyer
Kendall L. Miller
L. Edward Miller
Patrick J. Miller
Judson B. Montgomery
Angela K. Nelson
Deborah E. Nelson
W. Hugh O'Riordan
Michael C. Orr
Michael P. Pursley
Bradley V. Sneed
H. Barton Thomas
Conley E. Ward
Robert B. White

Raymond D. Givens
James A. McClure
Stephanie C. Westermeier
OF COUNSEL

John A. Miller, LL.M. *
TAX CONSULTANT

*Licensed in Kentucky only

August 13, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of each of the following documents:

1. UWID's Notice of Service of UWID's Responses to Protestants Nampa & Meridian Irrigation District, City of Caldwell, City of Meridian, and Terteling Entities First Set of Discovery Requests to United Water Idaho; and
2. UWID's Notice of Service of UWID's Responses to Protestant Bureau of Reclamation's First Set of Discovery Requests to United Water Idaho.

Please conform the copy of each document and return them to our office in the enclosed self-addressed, stamped envelope. Also enclosed please find copies of the amended notices of deposition for the City of Eagle, City of Middleton, and the City of Star.

Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing NOS - NMID & BOR.DOC

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
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BEFORE THE
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IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S RESPONSES TO PROTESTANT BUREAU OF RECLAMATION'S FIRST SET OF DISCOVERY REQUESTS TO UNITED WATER IDAHO**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant the Bureau of Reclamation a true and correct copy of UWID's Responses to Protestant Bureau of Reclamation's First Set of Discovery Requests to United Water Idaho by mailing the same to its counsel of record: Kathleen Marion Carr, Office of the Field Solicitor, U.S. Department of the Interior, 550 West Fort Street, MSC 020, Boise, ID 83724-0020 and E. Gail McGarry, Pacific Northwest Region, U.S. Bureau of Reclamation, 1150 N. Curtis Road, Boise, ID 83706-1234.

Respectfully submitted this 13th day of August, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

RECEIVED
AUG 14 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: 208-388-1200
Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S RESPONSES TO PROTESTANTS NAMPA & MERIDIAN IRRIGATION DISTRICT, CITY OF CALDWELL, CITY OF MERIDIAN, AND TERTELING ENTITIES' FIRST SET OF DISCOVERY REQUESTS TO UNITED WATER IDAHO**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestants Nampa & Meridian Irrigation District, City of Caldwell, City of Meridian and the Terteling Entities the original of UWID's Responses to Protestants Nampa & Meridian Irrigation District, City of Caldwell, City of Meridian, and Terteling Entities' First Set of Discovery Requests to United Water Idaho by mailing the same to their counsel of record: Charles L. Honsinger, Ringert Clark, Chartered, 455 S. Third Street, P.O. Box 2773, Boise, ID 83701-2773

Respectfully submitted this 13th day of August, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
AUG 14 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AMENDED NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF STAR**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 12th day of September 2003 at the hour of 9:00 a.m. at the offices of the Eagle Sewer District, Eagle Sewer District, 44 North Palmetto Ave., Eagle, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Star in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 13th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

__X__ U.S. Mail
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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
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Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Scott L. Campbell, Esq.
Angela Schaer Kaufmann, Esq.
Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
P.O. Box 829
Boise, ID 83701-0829

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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

RECEIVED
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Department of Water Resources

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
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P.O. Box 2720
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Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AMENDED NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF MIDDLETON**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 11th day of September 2003 at the hour of 9:00 a.m. at the offices of the Eagle Sewer District, Eagle Sewer District, 44 North Palmetto Ave., Eagle, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Middleton in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 13th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

_X_ U.S. Mail
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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Angela Schaer Kaufmann, Esq.
Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

RECEIVED
AUG 14 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
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Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AMENDED NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF EAGLE**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 25th day of September 2003 at the hour of 9:00 a.m. at the offices of the Eagle Sewer District, Eagle Sewer District, 44 North Palmetto Ave., Eagle, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Eagle in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 13th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
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Bruce M. Smith, Esq.
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Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
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Albert P. Barker, Esq.
Travis L. Thompson, Esq.
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205 North 10th, Suite 520
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Robert W. Talboy
Ellsworth, Kallas & Talboy, PLLC
2402 West Jefferson Street
Boise, ID 83702

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Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

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John M. Marshall

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AUG 13 2003
Department of Water Resources

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John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AMENDED NOTICE OF DEPOSITION DUCES TECUM OF THE TERTELING ENTITIES**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 27th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the Terteling Entities in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 12th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

_X_ U.S. Mail
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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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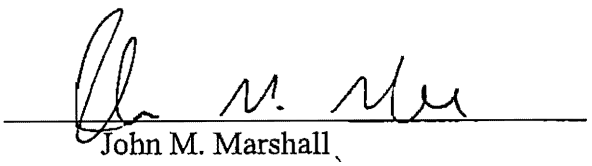
Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

_X_ U.S. Mail
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Scott L. Campbell, Esq.
Angela Schaer Kaufmann, Esq.
Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
P.O. Box 829
Boise, ID 83701-0829

_X_ U.S. Mail
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail



John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
AUG 13 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AMENDED NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF CALDWELL**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 29th day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Caldwell in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 12th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

X U.S. Mail
____ Facsimile
____ Hand Delivery
____ Overnight Mail

Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

X U.S. Mail
____ Facsimile
____ Hand Delivery
____ Overnight Mail

Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

X U.S. Mail
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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

John M. Marshall

GIVENS PURSLEY LLP

LAW OFFICES
277 North 6th Street, Suite 200
PO Box 2720, Boise, Idaho 83701
TELEPHONE: 208 388-1200
FACSIMILE: 208 388-1300
WEBSITE: www.givenspursley.com

RECEIVED
AUG - 8 2003
Department of Water Resources

Gary G. Allen
Christopher J. Beeson
Jessica M. Borup
William C. Cole
Michael C. Creamer
Thomas E. Dvorak
Roy Lewis Eiguren
Timothy P. Fearnside
Jeffrey C. Fereday
Steven J. Hippler
Karl T. Klein
Debora K. Kristensen
Anne C. Kunkel
Franklin G. Lee
David R. Lombardi
D. David Lorello, Jr.
Emily A. MacMaster
Kimberly D. Maloney
John M. Marshall
Kenneth R. McClure
Kelly Greene McConnell
Cynthia A. Melillo
Christopher H. Meyer
Kendall L. Miller
L. Edward Miller
Patrick J. Miller
Judson B. Montgomery
Angela K. Nelson
Deborah E. Nelson
W. Hugh O'Riordan
Michael C. Orr
Kenneth L. Pursley
Bradley V. Sneed
H. Barton Thomas
Conley E. Ward
Robert B. White
Raymond D. Givens
James A. McClure
Stephanie C. Westermeier
OF COUNSEL
John A. Miller, LL.M. *
TAX CONSULTANT
*Licensed in Kentucky only

August 7, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of each of the following documents:

1. UWID's Notice of Service of UWID's Responses to Pioneer Irrigation District and Settlers Irrigation District's Second Set of Discovery Requests to United Water Idaho Inc.; and

2. UWID's Notice of Service of UWID's Responses to Cities of Eagle, Kuna, Middleton, Star and the Star Sewer and Water District's First Set of Interrogatories, Requests for Admissions, and Requests for Production to United Water Idaho.

Please conform the copy of each document and return them to our office in the enclosed self-addressed, stamped envelope. Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing Two NOS.DOC

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: 208-388-1200
Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
AUG - 8 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S RESPONSES TO CITIES OF EAGLE, KUNA, MIDDLETON, STAR AND THE STAR SEWER AND WATER DISTRICT'S FIRST SET OF INTERROGATORIES, REQUESTS FOR ADMISSIONS, AND REQUESTS FOR PRODUCTION TO UNITED WATER IDAHO**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestants Cities of Eagle, Kuna, Middleton, Star and the Star Sewer and Water District a true and correct copy of UWID's Responses to Cities of Eagle, Kuna, Middleton, Star and the Star Sewer and Water District's First Set of Interrogatories, Requests for Admission, and Requests for Production to United Water Idaho by mailing the same to their counsel of record: Bruce M. Smith, Moore Smith Buxton & Turcke, 225 North 9th Street, Suite 420, Boise, Idaho 83702.

Respectfully submitted this 7th day of August, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Moffatt Thomas Barrett Rock & Fields, Chartered
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Boise, ID 83701-0829

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Travis L. Thompson, Esq.
Barker, Rosholt & Simpson, LLP
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Boise, ID 83701-2139

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Robert W. Talboy
Ellsworth, Kallas & Talboy, PLLC
2402 West Jefferson Street
Boise, ID 83702

X U.S. Mail
_____ Facsimile
_____ Hand Delivery
_____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

X U.S. Mail
_____ Facsimile
_____ Hand Delivery
_____ Overnight Mail

John M. Marshall

RECEIVED
AUG - 8 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: 208-388-1200
Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S RESPONSES TO PIONEER IRRIGATION DISTRICT AND SETTLERS IRRIGATION DISTRICT'S SECOND SET OF DISCOVERY REQUESTS TO UNITED WATER IDAHO INC.**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestants Pioneer Irrigation District and Settlers Irrigation District a true and correct copy of UWID's Responses to Pioneer Irrigation District and Settlers Irrigation District's Second Set of Discovery Requests to United Water Idaho Inc. by mailing the same to their counsel of record: Scott L. Campbell, Moffatt Thomas Barrett Rock & Fields, 101 S. Capital Blvd., 10th Floor, P.O. Box 829, Boise, Idaho 83701-0829

Respectfully submitted this 7th day of August, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

FAX COVER SHEET

DATE: Thursday, August 07, 2003

PAGES (INCLUDING COVER): 86

ORIGINAL TO FOLLOW: No

From:
JOHN M. MARSHALL
GIVENS PURSLEY LLP
Suite 200, Park Place
277 North Sixth Street
Post Office Box 2720
Boise, Idaho 83701-2720
Telephone: (208) 388-1200
Facsimile: (208) 388-1300
Email: jmm@givenspursley.com
Web: www.givenspursley.com

RE: UWID – Integrated Municipal Application Package
Our File No. 30-71

TO: Debbie Gibson

SEND TO FAX PHONE: 327-7866

MESSAGE:

Please see the attached notices of deposition in the IMAP matter. If you have any questions please call.

— John

If this fax does not transmit fully or is difficult to read, please contact Katrina Thomas, at (208) 388-1227.

CONFIDENTIALITY NOTICE

This facsimile may contain confidential information that is protected by the attorney-client or work product privilege. It is intended only for the use of the individual(s) named above. If you are not a named recipient or an employee responsible for delivering the facsimile, you are instructed not to deliver, distribute or copy this facsimile, nor should you disclose its contents or take any action in reliance on the information it contains. If you have received this facsimile in error, please notify us immediately by telephone to arrange for the return of the transmitted documents to us. Thank you.

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
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Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF EAGLE**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 12th day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Eagle in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
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E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
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Boise, ID 83706-1234

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Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
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Travis L. Thompson, Esq.
Barker, Rosholt & Simpson, LLP
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2402 West Jefferson Street
Boise, ID 83702

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Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

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John M. Marshall

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John M. Marshall, Esq. (Idaho State Bar No. 5628)
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Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF MIDDLETON**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 13th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Middleton in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
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Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Scott L. Campbell, Esq.
Angela Schaer Kaufmann, Esq.
Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
P.O. Box 829
Boise, ID 83701-0829

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Albert P. Barker, Esq.
Travis L. Thompson, Esq.
Barker, Rosholt & Simpson, LLP
205 North 10th, Suite 520
P.O. Box 2139
Boise, ID 83701-2139

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Ellsworth, Kallas & Talboy, PLLC
2402 West Jefferson Street
Boise, ID 83702

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Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

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John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF STAR**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 13th day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Star in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed.

You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

_____ U.S. Mail
__X__ Facsimile
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_____ Overnight Mail

Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Scott L. Campbell, Esq.
Angela Schaer Kaufmann, Esq.
Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
P.O. Box 829
Boise, ID 83701-0829

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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF STAR SEWER AND WATER DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 13th day of August 2003 at the hour of 3:30 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Star Sewer and Water District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

_____ U.S. Mail
__X__ Facsimile
_____ Hand Delivery
_____ Overnight Mail

Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Scott L. Campbell, Esq.
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Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
P.O. Box 829
Boise, ID 83701-0829

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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF PIONEER IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 19th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Pioneer Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for Pioneer Irrigation District's protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

____ U.S. Mail
_X_ Facsimile
____ Hand Delivery
____ Overnight Mail

Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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____ Hand Delivery
____ Overnight Mail

Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Scott L. Campbell, Esq.
Angela Schaer Kaufmann, Esq.
Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
P.O. Box 829
Boise, ID 83701-0829

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Albert P. Barker, Esq.
Travis L. Thompson, Esq.
Barker, Rosholt & Simpson, LLP
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF SETTLERS IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 21st day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Settlers Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
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225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
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Boise, ID 83701-0500

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John M. Marshall

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John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Boise, Idaho 83701-2720
Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF BOISE-KUNA IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 22nd day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Boise-Kuna Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources
State Office
1301 N. Orchard Street
P.O. Box 83720
Boise, ID 83720-0098

_____ U.S. Mail
__X__ Facsimile
_____ Hand Delivery
_____ Overnight Mail

Peter R. Anderson, Esq.
Hearing Officer
729 W. Braemere Rd.
Boise, ID 83702

__X__ U.S. Mail
_____ Facsimile
_____ Hand Delivery
_____ Overnight Mail

Gary L. Spackman
Regional Manager
Idaho Department of Water Resources
Western Regional Office
2735 Airport Way
Boise, ID 83705

_____ U.S. Mail
__X__ Facsimile
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_____ Overnight Mail

Kathleen Marion Carr, Esq.
Office of the Field Solicitor
U.S. Department of the Interior
550 West Fort Street
Boise, ID 83724

_____ U.S. Mail
__X__ Facsimile
_____ Hand Delivery
_____ Overnight Mail

Mr. Edward Squires
Hydro Logic, Inc.
1002 West Franklin St.
Boise, ID 83702-5431

_____ U.S. Mail
__X__ Facsimile
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E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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455 S. Third Street
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Scott L. Campbell, Esq.
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Albert P. Barker, Esq.
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John M. Marshall, Esq. (Idaho State Bar No. 5628)
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277 North 6th Street, Suite 200
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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF NAMPA AND MERIDIAN IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 22nd day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Nampa and Meridian Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

____ U.S. Mail
__X__ Facsimile
____ Hand Delivery
____ Overnight Mail

Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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____ Overnight Mail

Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Scott L. Campbell, Esq.
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Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
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Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Office: (208) 388-1200
Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF MERIDIAN**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 25th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Meridian in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

_____ U.S. Mail
__X__ Facsimile
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_____ Overnight Mail

Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

John M. Marshall

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John M. Marshall, Esq. (Idaho State Bar No. 5628)
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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE BUREAU OF RECLAMATION**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 25th day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the Bureau of Reclamation in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
Daniel V. Steenson, Esq.
Ringert Clark, Chart
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P.O. Box 2773
Boise, ID 83701-2773

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Andrew J. Waldera, Esq.
Moffatt Thomas Barrett Rock & Fields, Chartered
101 S. Capital Blvd., 10th Floor
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277 North 6th Street, Suite 200
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Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF DON READING**

TO: DON READING

YOU WILL PLEASE TAKE NOTICE that on the 26th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Don Reading in the above-entitled action upon oral examination pursuant to Rule 30 and other applicable rules of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed.

Albert P. Barker, Esq.
Travis L. Thompson, Esq.
Barker, Rosholt & Simpson, LLP
205 North 10th, Suite 520
P.O. Box 2139
Boise, ID 83701-2139

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Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

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____ Hand Delivery
____ Overnight Mail

John M. Marshall

Pursuant to Idaho Rule s of Civil Procedure 26, 30(b)(5) and 34, you are further instructed to bring to the deposition all documents examined, analyzed, relied upon, incorporated or utilized in your review of the IMAP in forming the basis of you opinions regarding IMAP.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Assistant City Attorney
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P.O. Box 829
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Josephine P. Beeman, Esq.
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409 West Jefferson
Boise, ID 83702-6049

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Dr. Don C. Reading
Consulting Economist
Ben Johnson Associates, Inc.
6070 West Hill Road
Boise, ID 83703

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_X_ Facsimile
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Boise, Idaho 83701-2720
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Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF CALDWELL**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 27th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Caldwell in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
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Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
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Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
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Matthew K. Wilde, Esq.
Assistant City Attorney
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Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE CITY OF KUNA**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 27th day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the City of Kuna in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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_X_ Facsimile
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Bruce M. Smith, Esq.
Tammy Zokan, Esq.
Moore, Smith, Buxton & Turcke, Chtd.
225 North 9th St., Ste. 420
Boise, ID 83702

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Matthew K. Wilde, Esq.
Assistant City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500

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Charles L. Honsinger, Esq.
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Ringert Clark, Chart
455 S. Third Street
P.O. Box 2773
Boise, ID 83701-2773

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John M. Marshall

Christopher H. Meyer, Esq. (Idaho State Bar No. 4461)
John M. Marshall, Esq. (Idaho State Bar No. 5628)
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Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF WILDER IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 28th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Wilder Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

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GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

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State Office
1301 N. Orchard Street
P.O. Box 83720
Boise, ID 83720-0098

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Peter R. Anderson, Esq.
Hearing Officer
729 W. Braemere Rd.
Boise, ID 83702

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Gary L. Spackman
Regional Manager
Idaho Department of Water Resources
Western Regional Office
2735 Airport Way
Boise, ID 83705

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U.S. Department of the Interior
550 West Fort Street
Boise, ID 83724

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Hydro Logic, Inc.
1002 West Franklin St.
Boise, ID 83702-5431

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E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF BIG BEND IRRIGATION DISTRICT**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 28th day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Big Bend Irrigation District in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

2. The conditions or modifications to the IMAP, if any, that would resolve your protest.

You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	__X__ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	____ U.S. Mail __X__ Facsimile ____ Hand Delivery ____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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Fax: (208) 388-1300
Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF BOISE PROJECT BOARD OF CONTROL**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 29th day of August 2003 at the hour of 9:00 a.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of Boise Project Board of Control in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

1. Each and every basis for your protest in this matter.

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You are further required to provide and to produce at the deposition all documents in your possession related your protest in this matter.

DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources
State Office
1301 N. Orchard Street
P.O. Box 83720
Boise, ID 83720-0098

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Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**NOTICE OF DEPOSITION DUCES TECUM OF THE TERTELING ENTITIES**

TO: THE ABOVE NAMED PROTESTANT AND ITS ATTORNEY OF RECORD

YOU WILL PLEASE TAKE NOTICE that on the 29th day of August 2003 at the hour of 1:00 p.m. at the offices of Givens Pursley LLP, 277 North 6th Street, Suite 200, Boise, Idaho, the Applicant United Water Idaho Inc. will take the deposition of the Terteling Entities in the above-entitled action upon oral examination pursuant to Rule 30(b)(6) of the Idaho Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths, and continuing from day to day thereafter, until said deposition is completed. You are required to designate one or more officers, directors or managing agents to be examined regarding:

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DATED this 7th day of August 2003.

GIVENS PURSLEY LLP

By _____
John M. Marshall
Attorneys for Applicant United Water

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John M. Marshall

RECEIVED
AUG - 7 2003
Department of Water Resources

GIVENS PURSLEY LLP

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Emily A. MacMaster
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John M. Marshall
Kenneth R. McClure
Kelly Greene McConnell
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Christopher H. Meyer
Kendall L. Miller
L. Edward Miller
Patrick J. Miller
Judson B. Montgomery
Angela K. Nelson
Deborah E. Nelson
W. Hugh O'Riordan
Michael C. Orr
Kenneth L. Pursley
Bradley V. Sneed
H. Barton Thomas
Conley E. Ward
Robert B. White

Raymond D. Givens
James A. McClure
Stephanie C. Westermeier
OF COUNSEL

John A. Miller, LL.M. *
TAX CONSULTANT

*Licensed in Kentucky only

August 6, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of each of the following documents:

1. UWID's Motion to Compel Responses to UWID's First Set of Discovery Requests to Pioneer Irrigation District and Settlers Irrigation District; and

2. Affidavit of John M. Marshall in Support of UWID's Motion to Compel.

Please conform the copy of each document and return them to our office in the enclosed self-addressed, stamped envelope. Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing Motion to Compel.DOC

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John M. Marshall, Esq. (Idaho Bar No. 5628)
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Counsel for Applicant United Water Idaho Inc.

RECEIVED
AUG - 7 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S MOTION TO COMPEL RESPONSES TO UWID'S FIRST SET OF DISCOVERY REQUESTS TO PIONEER IRRIGATION DISTRICT AND SETTLERS IRRIGATION DISTRICT**

MOTION

United Water Idaho Inc. hereby moves for an order compelling responses to discovery from protestants Pioneer Irrigation District and Settlers Irrigation District. This motion is brought pursuant to Procedure Rule 522.

SUMMARY

On July 2, 2003 United Water served Pioneer Irrigation District and Settlers Irrigation District (collectively the "Districts") with United Water's first set of discovery requests. United Water received the Districts' responses on July 17, 2003. Copies of the Districts' responses are attached to the Affidavit of John M. Marshall filed herewith.

With respect to Interrogatory Numbers 10, 12, 13, 14, 19, 20, 21, 22, and 23, the Districts have declined to respond on grounds that the "interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence." With respect to Interrogatories 15 and 16, the Districts have declined to provide the requested information on grounds that their analysis is ongoing. On July 29, 2003, United Water wrote to counsel for Pioneer and Settlers demanding answers to the interrogatories identified above. By letter dated August 29, 2003, the Districts indicated they will not answer and directed United to bring this motion.

ARGUMENT

The sole issue presented with respect to Interrogatory Numbers 10, 12, 13, 14, 19, 20, 21, 22, and 23 is whether the interrogatories seek relevant information and/or information that is not reasonably calculated to lead to the discovery of admissible evidence. This motion takes up each interrogatory in turn.

Interrogatory Number 10 asks the Districts to "describe and quantify the hydrologic impact on the District's water rights which is likely to result if the [IMAP] were approved." This interrogatory goes to the question of injury to other water rights.

The Districts themselves have recognized this is a relevant issue. In Response to Interrogatory No. 8, the Districts raise the injury question: "the Application will injure other water rights due to their contemplated incorporation and use of the integrated points of diversion system." Moreover, in its Statements of Issues No. 12, they state that the "IMAP does not adequately protect senior water rights (whether ground or surface water, and not just from well interference)."

Because injury to other water rights is unquestionably an issue in these proceedings, it cannot reasonably be argued that inquiry into the hydrologic effects of the Application on the Districts' water rights is irrelevant and not calculated to lead to the discovery of admissible evidence. The Districts should be compelled to answer.

Interrogatory Nos. 12 and 13 ask the Districts for information about its conservation efforts or programs. Conservation has been raised as an issue in this proceeding. For example, in the Boise Project's Statement of Issues, it identifies as an issue "whether United Water's future needs claim is inconsistent with the conservation of water in the state, in that no water conservation, xeriscape or other similar measures are factioned [sic] into the calculations for future needs." Idaho Rule of Civil Procedure 26(b)(1) states that discovery may be had regarding any matter that "relates to the claim or defense of any other party." Because conservation is an issue, United Water is entitled to understand how protestants have approached the issue with regard to their water rights.

Moreover, the Districts themselves have denied United Water's request for admission that the IMAP transfers are consistent with the conservation of water resources within the state of Idaho. Conservation is a relevant issue in this proceeding and the Districts must be made to answer United Water's questions on the subject.

Interrogatory Number 14 requests information on the quantification of the Districts' water use. This information is relevant to consideration of the Districts' claims of potential injury and allegations that the IMAP is not in the public interest because it will allow United Water to "hold water rights in excess of current demand and use, thereby, [sic] tying up the public water resource." Response to Interrogatory No. 8.

To evaluate the Districts' claims, United Water is entitled to know the extent of their water use.

Interrogatory Number 19 asks the Districts about their plans to annex new lands. This request is relevant to the issue raised by the Boise Project in its Statement of Issues that "irrigation districts should be providing water for irrigation of the areas United Water claims it will irrigate, including retrofit of areas currently supplied by United Water." To evaluate this claim, United Water is entitled to know whether irrigation districts have plans to annex lands within United Water's planning area.

Interrogatory Nos. 20 through 22 explore the irrigation issue raised by protestants by seeking information about the quantity of water the Districts use to serve lawn irrigation demands. The requests are further relevant to claims that the IMAP will tie up the public resource by exploring whether the Districts and others have sufficient water rights to supply the irrigation uses within their systems.

Interrogatory No. 23 asks whether the Districts have done any planning for future demands. This question clearly is relevant given the Districts' protests that challenge the planning process undertaken by United Water. The Districts have challenged United Water's proposed planning horizon and its planning area, arguing the horizon is too long and the area too large. Because these issues have been raised, the extent to which other entities, including the Districts, have undertaken any future water planning is relevant. The request is further relevant to the Districts' claim that United Water will tie up the water resource. To evaluate this claim, United Water is entitled to know what others' have planned for water development. The Hearing Officer should compel an answer.

Interrogatory Numbers 15 and 16. The Districts also have refused to provide the information requested in Interrogatory Numbers 15 and 16. Interrogatory 15 asks the District to identify which of United Water's rights they contend are forfeited and to provide the supporting facts. Interrogatory 16 asks the Districts to identify their disagreements with the analysis used by John Church in the IMAP. In their answers to each, the Districts contend their analysis is ongoing, and on this basis, provide no information. It may be true that the Districts have not completed their analyses, but this is not justification for withholding information they currently have. United Water is entitled to know what the Districts have at this time. The Hearing Officer should compel the Districts to provide United Water with currently available information responsive to these requests.

Respectfully submitted this 6th day of August, 2003.

GIVENS PURSLEY LLP

By: _____
Christopher H. Meyer

By: _____
John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Department of Water Resources State Office 1301 N. Orchard Street P.O. Box 83720 Boise, ID 83720-0098	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

E. Gail McGarry, P.E.
Program Manager
Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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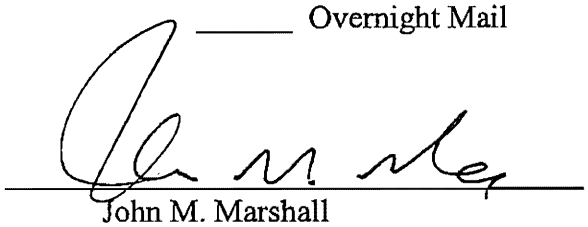
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Angela D. Schaer, Esq.
Andrew J. Waldera, Esq.
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Robert W. Talboy, Esq. Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail



John M. Marshall

RECEIVED
AUG - 7 2003
Department of Water Resources

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www.givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS	**AFFIDAVIT OF JOHN M. MARSHALL IN SUPPORT OF UWID'S MOTION TO COMPEL**

JOHN M. MARSHALL, being first duly sworn on oath, deposes and states as follows:

1. I am one of the attorney's of record for Applicant United Water Idaho Inc. ("UWID" or "United Water") in the above captioned matter.

2. On July 2, 2003 United Water served Pioneer Irrigation District and Settlers Irrigation District (collectively the "Districts") with United Water's first set of discovery requests.

3. On July 17, 2003 United Water received the Districts' responses to UWID's first set of discovery requests. True and correct copies of the responses are attached hereto as Exhibit A.

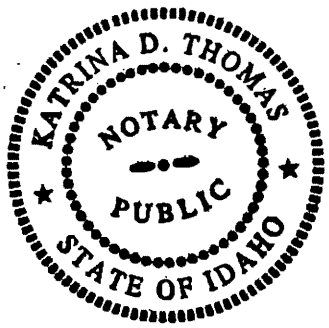
4. On July 29, 2003 I sent a letter to counsel for the Districts requesting they respond to several Interrogatories contained in the first discovery requests. A true and correct copy of the letter is attached hereto as Exhibit B.

5. On July 29, 2003 counsel for the Districts' responded in a letter directing UWID to file the Motion to Compel. A true and correct copy of this letter is attached hereto as Exhibit C.

DATED this 6th day of August, 2003.

John M. Marshall

Subscribed and sworn to before me this 6th day of August, 2003.



Notary Public for Idaho
Residing at: Boise, ID
My Commission Expires: 4-10-06

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Josephine P. Beeman, Esq.
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_____ Facsimile
_____ Hand Delivery
_____ Overnight Mail

John M. Marshall

EXHIBIT A

Attorneys for Pioneer Irrigation District
and Settlers Irrigation District

Scott L. Campbell, ISB No. 2251
Angela Schaer Kaufmann, ISB No. 5436
MOFFATT, THOMAS, BARRETT, ROCK & FIELDS, CHARTERED
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18946.26

RECEIVED
JUL 17 2003
Givens Pursley, LLP

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE (CONSISTING OF 99 APPLICATIONS FOR TRANSFERS OF WATER RIGHTS, AND 13 APPLICATIONS FOR AMENDMENT OF PERMITS) IN THE NAME OF UNITED WATER IDAHO, INC.	**PIONEER IRRIGATION DISTRICT'S RESPONSES TO UWID'S FIRST SET OF DISCOVERY REQUESTS TO PIONEER IRRIGATION DISTRICT**

Pioneer Irrigation District ("Pioneer") hereby responds to UWID's First Set of Discovery Requests to Pioneer Irrigation District, pursuant to the Idaho Rules of Civil Procedure, the Idaho Department of Water Resources' Rules of Procedure, and the Hearing Officer's Third PreHearing Order.

GENERAL OBJECTIONS

1. Pioneer has not completed its own investigations and/or discovery. Accordingly, the responses that follow are based upon the best knowledge, information, and

ORIGINAL

belief of Pioneer at this time. Pioneer reserves the right to make any further responses if it appears that any omission or error has been made in connection with these responses or that more accurate information is or has become available. These responses are made without prejudice to Pioneer's right to use in later discovery or to present at trial, such evidence as may later be discovered or evaluated.

2. Pioneer objects to the definitions and instructions to the extent they purport to require discovery requests beyond that required under the Idaho Rules of Civil Procedure. These responses are provided in accordance with the Idaho Rules of Civil Procedure irrespective of any definitions and instructions that may accompany these discovery requests.

3. These responses are made subject to all objections as to competence, relevance, materiality, and admissibility. These 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 trial.

4. Pioneer 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. Pioneer has, to the extent possible, construed each request as requesting only information and/or documents not subject to any applicable protection.

5. No incidental or implied admissions are intended. The fact that Pioneer has responded to any discovery request or part thereof should not be taken as an admission that Pioneer accepts that the discovery request or the response or objection thereto constitutes admissible evidence. Similarly, the fact that Pioneer has responded to all or part of an interrogatory is not intended to and shall not be construed to be a waiver by Pioneer of all or part of any objection to other interrogatories. Pioneer's answers to any discovery requests herein do not constitute a waiver of Pioneer's right to object to any future additional, or supplemental discovery requests regarding the same or similar matter.

6. Pioneer further objects to these discovery requests because they appear to attempt to separate out the transfer component of the IMAP from the applications for permit, and from the other significant legal issues involved in the IMAP, including but not limited to the appropriateness of an integrated points of diversion system, the appropriateness of a fifty year planning horizon and the applicability of the forfeiture doctrine to municipal water rights. UWID has consistently maintained that this is an "Integrated Municipal Application Package," and Pioneer maintains that it is impossible to consider the transfers of water rights contained within that package prior to and apart from the significant legal issues (as well as others) just described.

RESPONSES TO INTERROGATORIES, REQUESTS FOR ADMISSION AND REQUESTS FOR PRODUCTION OF DOCUMENTS

INTERROGATORY NO. 1: Please identify yourself (the person responding to these discovery requests) and state your relationship with the District.

RESPONSE TO INTERROGATORY NUMBER 1: Kenneth E. Brush. Mr. Brush is the President of the Board of Directors of Pioneer Irrigation District. Scott L. Campbell

and Angela Schaer Kaufmann, counsel for Pioneer, assisted Mr. Brush in preparing these responses.

INTERROGATORY NO. 2: Please identify each and every person with whom you consulted in preparing these responses.

RESPONSE TO INTERROGATORY NUMBER 2: See Response to Interrogatory Number 1.

INTERROGATORY NO. 3: Please identify each and every witness the Protestant intends to call (or may call) at the hearing in this matter. With respect to each of the witnesses so identified, please identify the person as a fact or expert witness, and state the subject matter and general substance of the facts and opinions to which he or she is expected to testify.

RESPONSE TO INTERROGATORY NUMBER 3: Objection. Discovery is still in its early stages, and Pioneer has not yet fully determined who it may call as a witness in this matter. Moreover, the Hearing Officer has not yet set a deadline for disclosure of witnesses. Subject to, and without waiving that objection, and reserving its right to disclose witnesses in accordance with the Hearing Officer's scheduling order(s), Pioneer states that it may call the following individuals as fact witnesses:

Jeff Scott, Superintendent
Pioneer Irrigation District
P.O. Box 426
Caldwell, ID 83606

Kenneth E. Brush, Board President
Pioneer Irrigation District
P.O. Box 426
Caldwell, ID 83606

Alan Newbill, Board Member
Pioneer Irrigation District
P.O. Box 426
Caldwell, ID 83606

Don Sayre, Board Member
Pioneer Irrigation District
P.O. Box 426
Caldwell, ID 83606

Each of the witnesses described above may testify regarding the effect of the IMAP upon Pioneer's water rights, and the effect of the IMAP on the local public interest.

Pioneer may also call the following expert witness: Don Reading of Ben Johnson Associates, Inc., 6070 Hill Road, Boise, ID 83703. Mr. Reading is expected to testify regarding the methodology and validity of the data used and conclusions reached by Mr. John Church.

Pioneer further reserves the right to examine each and every witness, whether fact or expert, who may be called by any other party in the above captioned matter.

INTERROGATORY NO. 4: Please identify each and every consultant or expert who has been consulted in connection with this proceeding or who has been employed, retained or engaged by the Protestant in connection with this matter. With respect to each of the persons so identified, please indicate the nature and purpose of their work as it relates to this proceeding, and indicate whether the person is expected to be called as a witness.

RESPONSE TO INTERROGATORY NUMBER 4: Objection. This interrogatory calls for material protected by the attorney-client privilege and the work product doctrine, and is not discoverable under Idaho Rule of Civil Procedure 26(B)(4)(b).

INTERROGATORY NO. 5: Please identify and describe each exhibit which the Protestant intends to introduce or utilize at the time of the hearing on the above action.

RESPONSE TO INTERROGATORY NUMBER 5: Objection. This interrogatory calls for material protected by the attorney-client privilege and work product doctrine. In addition, the Hearing Officer has not yet set a deadline for disclosure of exhibits. Subject to, and without waiving those objections, Pioneer has not yet determined what exhibits it

will introduce at the hearing in this matter. Pioneer will supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's scheduling order(s).

INTERROGATORY NO. 6: Please describe in full, complete and material detail all statements and/or admissions relevant to the issues contested in this proceeding which the Protestant attributes to the Applicant or those speaking for the Applicant or in support of the Applicant's application. For each such statement or admission please state: (a) the substance thereof; (b) the identity of the person making the statement or admission; (c) the date and/or place where said admission was made; and (d) the identity of each and every person who heard, saw or observed each such statement or admission.

RESPONSE TO NO. INTERROGATORY NO. 6: Objection. This interrogatory is vague, ambiguous, overbroad, and compound. Subject to, and without waiving those objections, Pioneer states that it may use any statements or admissions made by UWID, including its counsel, employees, officers, directors, consultants, agents, and any others ("UWID") with actual or apparent authority to speak on behalf of UWID in the following contexts:

a) the IMAP,

b) any documents which UWID has disclosed in response to any of the Protestants' informal requests for information,

c) any written statements UWID has disclosed in response to any of the Protestants' informal requests for information,

d) any statements made by or on behalf of UWID at any hearing in this matter,

e) any statements UWID makes in any pleadings filed or discovery responses served in this matter,

f) any statements UWID makes in any depositions taken in this matter,

g) any statements made in any correspondence to Pioneer, its counsel, or consultants,

h) any statements made or reported in any news publication or report, whether written or oral.

Pioneer reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's orders.

INTERROGATORY NO. 7: Please state each and every basis for the Protestant's protest.

RESPONSE TO INTERROGATORY NUMBER 7: Objection. This interrogatory calls for material protected by the attorney-client privilege and work product doctrine. Moreover, the protest speaks for itself. Subject to, and without waiving those objections, Pioneer refers UWID to its statement of the issues provided in this matter, as well as its initial response to Requests for Information, contained in correspondence from Scott L. Campbell to Christopher Meyer and John Marshall, dated May 27, 2003.

Pioneer notes that discovery in this matter is ongoing, as is Pioneer's analysis of the issues and pertinent facts. Pioneer reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR ADMISSION NO. 1: Please admit that the transfers included in the Application will not injure other water rights within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 1: Denied.

REQUEST FOR ADMISSION NO. 2: Please admit that the transfers included in the Application will not result in enlargement of the water rights proposed for transfer within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 2: Denied.

REQUEST FOR ADMISSION NO. 3: Please admit that the transfers included in the Application are consistent with the "conservation of water within the state of Idaho" within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 3: Pioneer is without sufficient knowledge and information to respond to this request for admission and, therefore, denies the same.

REQUEST FOR ADMISSION NO. 4: Please admit that the transfers included in the Application will not "significantly affect the agricultural base of the local area" within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 4: Denied.

REQUEST FOR ADMISSION NO. 5: Please admit the transfers included in the Application are within the local public interest within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 5: Denied.

INTERROGATORY NO. 8: If your response to any of the Requests for Admission Numbers 1 through 5 was other than an unqualified admission, then for each such Request for Admission, please state with specificity each and every reason, fact, or opinion of which you are aware that prevents your unqualified admission.

RESPONSE TO INTERROGATORY NUMBER 8: Objection. This interrogatory is compound and, in reality, constitutes five separate interrogatories. Pioneer further states that neither discovery nor its investigation of this matter is complete. Further, this interrogatory calls for material protected by the attorney-client and work product privileges. Finally, Pioneer objects on the basis that it is UWID's burden to affirmatively prove each and every element of Idaho Code section 42-222(1), and not Pioneer's burden to disprove those elements.

Subject to, and without waiving those objections, Pioneer states as follows:

1. As to Request for Admission Number 1 and its denial of the same, the transfers included in the Application will injure other water rights due to their contemplated incorporation and use of the integrated points of diversion system.

2. As to Request for Admission Number 2 and its denial of the same, the transfers may result in enlargement of the water rights due to the use of the integrated points of diversion system, and use of individual water rights in excess of the permitted, licensed, or decreed elements of those rights.

3. As to Request for Admission Number 3, Pioneer denied the same because it was without sufficient knowledge and information to answer that request for admission.

4. As to Request for Admission Number 4, if UWID is allowed to retain its current water rights, even though it admits that it does not currently use the entire quantity available under those paper water rights, and particularly if UWID is allowed to acquire water rights significantly in excess of current demand or demand projected in the reasonably near future, the agricultural base of the local area may be harmed because those involved in

agriculture may find themselves unable to acquire water rights due to UWID's senior but unused water rights.

5. As to Request for Admission Number 5, the transfers and the IMAP will not be in the local public interest because they will allow UWID to hold water rights in excess of current demand and use, thereby, tying up the public water resource. Further, the integrated points of diversion system will not be in the local public interest because it may lead to increased drawdowns in areas of certain wells, as well as increased impacts to surface water sources.

INTERROGATORY NO. 9: What is the total quantity of water available to the District under its water rights?

RESPONSE TO INTERROGATORY NUMBER 9: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence. It is also ambiguous as to the phrase "total quantity of water available."

INTERROGATORY NO. 10: Please describe and quantify the hydrologic impact on the District's water rights which is likely to result if the Application were approved.

RESPONSE TO INTERROGATORY NUMBER 10: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 11: Please describe and quantify the financial impact on the District which is likely to result if the Application were approved.

RESPONSE TO INTERROGATORY NUMBER 11: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 12: Please state whether the District has a water conservation program in effect today. Please describe in full the District's water conservation efforts or program. Please include a discussion of the history and development of the efforts or program.

RESPONSE TO INTERROGATORY NUMBER 12: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 13: Please identify, describe and summarize the results of all studies, by the District or others, assessing or evaluating the success of the District's water conservation efforts.

RESPONSE TO INTERROGATORY NUMBER 13: See Response to Interrogatory Number 12.

INTERROGATORY NO. 14: Please provide a quantification of water use by each user group served by the District for which the District keeps separate records. For example, if the District keeps records based on agricultural, commercial or domestic users, please provide a breakdown showing the total quantity of use for each group.

RESPONSE TO INTERROGATORY NUMBER 14: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 15: Please identify which of the Applicant's water rights included in the Application have been forfeited. For each water right identified, please state all the facts upon which you base your contention that the right has been forfeited.

RESPONSE TO INTERROGATORY NUMBER 15: Objection. Pioneer has not been able to fully make this determination because UWID continues to refuse to provide the information which Pioneer first requested in November 2002. Moreover, the Hearing Officer has ordered that the information requested in this interrogatory be disclosed on or before September 12, 2003, after discovery is closed. Subject to, and without waiving that objection, Pioneer's analysis in this regard is ongoing and has not been completed.

Pioneer reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's Third PreHearing Order.

INTERROGATORY NO. 16: Does the District disagree with the methodology used by Mr. Church and the conclusion he reached in creating the population and water demand projections in the Application? Please identify any such disagreements and explain.

RESPONSE TO INTERROGATORY NUMBER 16: Pioneer continues to review and refine its analysis of Mr. Church's methodology and conclusions, and has not yet reached conclusions of its own. Pioneer will supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's Third PreHearing Order.

INTERROGATORY NO. 17: You have stated in responses to informal information requests that the Applicant's planning area is speculative and in conflict with the Municipal Water Rights Act of 1996.

RESPONSE TO INTERROGATORY NUMBER 17: Objection. No question was asked.

INTERROGATORY NO. 18: Explain why the District believes the Applicant should have a planning horizon for a maximum of 25 years.

RESPONSE TO INTERROGATORY NUMBER 18: The ***maximum*** planning horizon should be 25 years because, upon information and belief, that is the maximum period of time for which cities, counties and local agencies plan. Any period of time beyond 25 years renders projections such as population and water demand speculative and completely unreliable.

INTERROGATORY NO. 19: What plans does the District have to annex new lands?

RESPONSE TO INTERROGATORY NUMBER 19: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 20: How many pressurized, residential irrigation systems or hook-ups does the District serve? (This interrogatory does not inquire as to the number of individual lots or parcels served by Pioneer [ ) sic].

RESPONSE TO INTERROGATORY NUMBER 20: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this

interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 21: Please explain how you quantify and track residential irrigation water use?

RESPONSE TO INTERROGATORY NUMBER 21: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 22: What is the average annual per capita usage in volume of water per irrigated acre and per customer for your members who use water for residential irrigation?

RESPONSE TO INTERROGATORY NUMBER 22: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 23: Has the District undertaken any planning for projected future water demands? If so, explain what it has done in this regard, who did or is doing the work, what the status of the work is, and what conclusions or tentative conclusions have been reached.

RESPONSE TO INTERROGATORY NUMBER 23: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this

interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 1: Please produce any and all documents which bear upon or provide evidence with respect to the decision by the District to file a protest in this matter. This Request for Production seeks production by the District of documents which include, but are not limited to, official minutes of any regular or special meeting of the District Council or its members, and all resolutions, ordinances, policies, directives, or other formal or informal actions of the District with respect to the District's protest of this water right transfer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Objection. Calls for material protected by the attorney-client privilege and work product doctrines. Subject to, and without waiving that objection, see the documents attached hereto.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents displaying the hydrologic impact that the Application would have on the District's water rights if the Application were approved.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: Pioneer has no such responsive documents at this time. Pioneer reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 3: Please produce all documents concerning the District's water conservation efforts or program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: See Response to Interrogatory Number 12.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents concerning the District's evaluation of the Applicant's planning area.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: Objection. Calls for material protected by the attorney-client privilege and work product doctrine. Subject to, and without waiving that objection, Pioneer states that the responsive documents are those which have been provided by UWID to Pioneer in response to Pioneer's informal requests for information. Pioneer reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 5: Please produce all documents concerning the District's evaluation of the Applicant's planning horizon.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Objection. Calls for material protected by the attorney-client privilege and work product doctrine. Subject to, and without waiving that objection, Pioneer states that the responsive documents are those which have been provided by UWID to Pioneer in response to Pioneer's informal requests for information. Pioneer reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents concerning the District's evaluation of forfeiture of any of Applicant's water rights.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Objection. Calls for material protected by the attorney-client privilege and work product doctrine. Subject to, and without waiving that objection, Pioneer states that the responsive documents are those which have been provided by UWID to Pioneer in response to Pioneer's informal requests for

information. Pioneer reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

DATED this 17th day of July 2003.

MOFFATT, THOMAS, BARRETT, ROCK & FIELDS, CHARTERED

By Angela Schaer Kaufmann for
Scott L. Campbell - Of the Firm

By Angela Schaer Kaufmann
Angela Schaer Kaufmann - Of the Firm
Attorneys for Pioneer Irrigation District
and Settlers Irrigation District

DATED this 16th day of July 2003.

By Kenneth Brush
Kenneth E. Brush, Board President
Pioneer Irrigation District

STATE OF IDAHO)
) ss.
County of Ada)

On this 16th day of July 2003, before me, the undersigned notary public in and for said state, personally appeared **KENNETH E. BRUSH**, President of the Board of Directors of **PIONEER IRRIGATION DISTRICT**, an irrigation district organized and existing under and by virtue of the laws of the State of Idaho, known or identified to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he has the authority to execute and executed the same for the purposes therein contained on behalf of **PIONEER IRRIGATION DISTRICT.**

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

DELORES M. COPELAND NOTARY PUBLIC STATE OF IDAHO

Delores M. Copeland
NOTARY PUBLIC FOR IDAHO
Residing at 10/21/04 Caldwell, Id.
My Commission Expires 12/31/04

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of July 2003, I caused a true and correct copy of the foregoing **PIONEER IRRIGATION DISTRICT'S RESPONSES TO UWID'S FIRST SET OF DISCOVERY REQUESTS TO PIONEER IRRIGATION DISTRICT** to be served by the method indicated below, and addressed to the following:

Director Idaho Department of Water Resources 1301 N. Orchard Street PO Box 83720 Boise, ID 83720 Fax: 327-5400	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Peter Anderson, Hearing Officer 729 W. Braemere Road Boise, ID 83702	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Gary L. Spackman, Regional Manager Idaho Department of Water Resources Western Region Office 2735 Airport Way Boise, ID 83705 Fax: 334-2348	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
United Water Idaho Inc. John M. Marshall Givens Pursley, LLP PO Box 2720 Boise, ID 83701 Fax: 388-1300	( ) U.S. Mail, Postage Prepaid (X) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Nampa & Meridian Irrigation District, City of Meridian, City of Caldwell, Terteling Company, and Terteling Trust No. 7 Charles L. Honsinger Ringert Clark 455 South 3rd Street PO Box 2773 Boise, ID 83701-2773 Fax: 342-4657	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile

City of Boise
Matthew Wilde
Boise City Attorney's Office
PO Box 500
Boise, ID 83701-0500
Fax: 384-4454

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Josephine P. Beeman
Beeman & Associates P.C.
409 W. Jefferson Street
Boise, ID 83702
Fax: 331-0954

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

City of Boise
Boise Public Works Department
Beth K. Baird
Environmental Programs Coordinator
150 N. Capitol Blvd.
PO Box 500
Boise, ID 83701-0500
Fax: 384-3905

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Boise Project Board of Control
Albert P. Barker
Barker Rosholt & Simpson
PO Box 2139
Boise, ID 83701-2139
Fax: 342-4657

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Bureau of Reclamation
E. Gail McGarry, PN-3100
1150 N. Curtis Road, Suite 100
Boise, ID 83706-1234
Fax: 378-5019

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Kathleen M. Carr
U.S. Department of the Interior
Office of the Solicitor
Pacific Northwest Region , Boise Field Office
550 West Fort Street, MSC 020
Boise, ID 83724-0020
Fax: 334-1378

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Estate of Eleanor I. Chase Matt J. Howard PO Box 190012 Boise, ID 83719 Fax: 333-8409	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Cities of Eagle, Kuna, Middleton & Star and Star Sewer District Bruce M. Smith Tammy A. Zokan Moore Smith Buxton & Turcke 225 N. 9th Street, Suite 420 Boise, ID 83702 Fax: 331-1202	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
City of Meridian Public Works Gary D. Smith 660 E. Watertower Meridian, ID 83642 Fax: 887-1297	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
City of Caldwell Engineering Department Gordon Law 621 E. Cleveland Blvd. Caldwell, ID 83605 Fax: 455-3003	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Ed Squires Hydrologic 1002 W. Franklin Boise, ID 83702-5431 Fax: 342-3100	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Robert W. Talboy Ellsworth Kallas Talboy, PLLC 2402 W. Jefferson Street Boise, ID 83702 Fax: 345-8945	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile

Mr. Michael Chase
70 W. Floating Feather Road
Eagle, ID 83616-3802

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Angela Schoen Kaufmann for
Scott L. Campbell

QUITCLAIM DEEDS: It was moved, seconded and carried to sign a Quitclaim Deed to Raul C. Anguiana and Editha Mejia for property assessed under Account #1762-2, upon payment of $193.61 to cover all assessments owing on said account.

CROSSING AGREEMENTS: It was moved, seconded and carried to sign the following Standard Crossing Agreements:

IDAHO POWER CO. for crossing the Steven's Lateral four times within Crestwood Estates #2, in road right-of-way, at thelocation described in their Exhibit A, in order to construct, operate, inspect, maintain and repair a 12.5 KV underground distribution power line;

IDACOMM, Inc. for crossing the 13.3 Lateral and 13.3 East with an underground and aerial fiber optic cable; and

CITY OF CALDWELL for crossing the Phyllis Canal with a 10" sewer main for Southgate Subdivision at Airport Avenue.

CONSTRUCTION, OPERATION AND MAINTENANCE AGREEMENTS: Attorney Campbell has completed the draft for said agreements for Ashton Hills, Black Hawk and Monarch Subdivision. Said drafts have been reviewed and are acceptable with Pioneer. Should the representatives for said subdivisions sign the agreements as written, it was moved, seconded and carried for the President of Pioneer's Board to sign them upon receipt of the same.

ARROWROCK: Letter of Agreement for Repayment of Rehabilitation Costs was sent to Pioneer. It was the consensus of the Board to put this matter on hold until Attorney Campbell has addressed some concerns contained therein with the Bureau of Reclamation.

UNITED WATER: Mr. Scott Rhead of United Water had requested a slot on the Board's agenda to inform the Board on the stand which United Water has taken on some issues of concern. The Board granted him his request and listened to what he had to say. No discussion took place nor was any Board action required.

THIES LITIGATION: A letter was sent to Attorney Campbell regarding said litigation from William F. Gigray, III who is representing the Canyon Highway Dist. #4. Said letter stated the Highway District is willing to provide all of the material and bedding for the tiling project on Laster Lane, and the City of Caldwell is willing to perform any necessary engineering and the equipment and labor necessary for the excavation and installation of the tiling of the High Line Canal along Laster Lane. It was stated, however, that the Highway District is not willing to pay the attorney fees Pioneer Irrigation District has expended to defend the District on said litigation. It was the consensus of the Board to not enter into said settlement due to the legal expenses not being covered which were expended on a matter for which the District held no responsibility.

CH_2MHill: An agreement with CH_2MHill for the Lucky Peak Storage Contract Environmental Assessessment was presented to the Board by Mr. Campbell. It was the consensus of the Board to sign said Agreement upon the recommendation of Mr. Campbell. The same was signed and returned to Attorney Campbell this day.

There being no further business appearing before the Board, meeting was adjourned.

ATTEST: Nalda E. Kelleher — Kenneth Brush

NALDA E. KELLEHER, Secretary — KENNETH E. BRUSH, President

COULTER BAY, etc. - Continued: Mr. Bailey was informed that a Crossing Agreement would need to be in place prior to the beginning of said work. The gentlemen were informed by Attorney Campbell that they would need to contact the Bureau of Reclamation and perhaps the Corp of Engineers as well as the Department of Water Resources for their plans which involve the Purdam Drain and Mason Creek, and issues which have to do with the Clean Water Act. These issues need to be resolved prior to Pioneer Irrigation District giving approval or signing a crossing agreement. Mr. Amar and Mr. Cox stated they would make the necessary contacts and be in contact with Supt. Jeff Scott and Attorney Campbell.

UNITED WATER: Mr. Scott Reed of United Water appeared before the Board regarding a deep well they wish to drill at Maple Hills and Franklin Road which Pioneer's Attorney has filed a protest against. A test well has been dug and it has been determined the producing zone is 265 feet. United Water has proposed to put a sealed casing down to the 265-foot depth. Mr. Reed presented other arguments as to why this well should not damage Pioneer's water rights. Attorney Campbell has presented to United Water the conditions for which Pioneer would withdraw their protest, but United Water representatives have determined to not comply with those conditions. It was the consensus of the Board to proceed with the District's protest.

EARL & ASSOC.: Attorney Campbell expressed concern about some of the language contained in the letters the District's engineer has sent out. It was the consensus of the Board to see if Mr. Mason can attend next month's Board meeting.

Attorney Campbell advised the Board on the development of matters he is representing the District on.

There being no further business appearing before the Board, meeting was adjourned.

ATTEST: Naida E. Kelleher — Kenneth Brush

NAIDA E. KELLEHER, Secretary — KENNETH E. BRUSH, President

January 7, 2003
Caldwell, Idaho
Reorganization Meeting

The new Board was called to order with the following present: Kenneth E. Brush, Alan Newbill, and newly re-elected Donald F. Sayre. Mr. Sayre was sworn in for a term of three years. It was moved, seconded and carried to re-elect Kenneth E. Brush as President for the coming year.

It was moved, seconded and carried to appoint Jeffrey C. Scott as Superintendent & Naida E. Kelleher as Secretary-Treasurer. Mr. Scott has selected Mark Zirschky to be the District's new Asst. Superintendent.

Per Diem for the Directors was again set at $75 per meeting, and each Director to continue to receive a $5.00 per month telephone allowance.

It was the consensus of the Board to continue holding the regularly scheduled meetings of the Board on the 7th of each month unless the 7th falls on a weekend or holiday, on which occasion the Board will meet the following working day.

NAMPA CITY ORDINANCES: It was the consensus of the Board to approve Ordinances #3115 for 1.82 acres and #3117 for 39.97 acres, whereby the City of Nampa annexes land from Pioneer Irrigation District into the Municipal Irrigation District of the City of Nampa for the purpose of distributing irrigation water to said parcels.

GLENN MEADOWS SUB.: A request was received from Attorney Wm. F. Gigray on behalf of Dr. Gilbert Hafen for Pioneer Irrigation District to share in the cost of the construction of the Spruce Street and Georgia Avenue pump site and the new pump to serve said subdivision.

A letter was also received from the City of Caldwell's Engineering Office regarding the City's review of the construction plans for the pressure irrigation for the referenced development. The City's redlined plans stipulate the pressure irrigation system will be owned, operated and maintained by Pioneer Irrigation District with an agreement specifying maintenance responsibility, including surface repair, to be by Pioneer.

It was the consensus of the Board to deny the request for Pioneer to share in the cost of the pump site, and also to deny entering into any agreement which would specify that Pioneer would accept the responsibility for maintaining facilities constructed in public right-of-ways.

MANCHESTER PARK #8: Upon the recommendation of the District's engineering firm to approve and accept the pressure irrigation and distribution system for Phase #8 of Manchester Park, it was the consensus of the Board to accept the same.

MARBLE VALLEY #1 & #2 AND STONEGATE SUBDIVISION #2: The District is in receipt of recommendations from the District's engineering firm to approve and accept into Pioneer's system the pressure irrigation and distribution systems for the above two named subdivisions. Attorney Campbell stated he had not been contacted regarding Construction, Operation and Maintenance Agreements for these two subdivisions. It was the consensus of the Board to table acceptance of the pressure irrigation and distribution systems for the above two named subdivisions until the Construction, Operation and Maintenance Agreements are in place.

WEST WIND DEVELOPMENT submitted a request for permission to tie into the 3" irrigation line on the north side of Ashton Hills Subdivision. It was moved, seconded and carried to approve said request.

FRED C. SCHREFFLER submitted a Claim for Damage or Injury regarding a 4" irrigation line which was on the District's easement, and was run over by a District employee who was spraying weeds. It was the consensus of the Board to deny the claim in the amount of $100.00.

PERSONNEL: Supt. Freeman submitted to the Board for information purposes the letter he wrote to Ronald R. Burcham, Ditchrider on Ride #1, as was requested by the Board at last month's meeting. Said letter was read by and signed by Mr. Burcham. A summary of the meeting with Mr. Burcham was also given to the Board for informational purposes.

A letter received from the Manchester Park Board of Directors was also given to the Board. Said letter commended Chuck Meyers, Ditchrider #5, for his efforts on behalf of the waterusers in Manchester Park.

BY-LAWS: A copy of the District's By-Laws was given to Director Alan Newbill for his information.

LEGAL MATTERS: Attorney Campbell advised the Board of the litigation status of the Thies lawsuit, the United Water transfer, and gave a progress report of the Snake River Basin Adjudication. No action was required.

There being no further business appearing before the Board, meeting was adjourned.

ATTEST: Linda E. Fowler Kenneth Brual

Attorneys for Pioneer Irrigation District
and Settlers Irrigation District

Scott L. Campbell, ISB No. 2251
Angela Schaer Kaufmann, ISB No. 5436
MOFFATT, THOMAS, BARRETT, ROCK &
FIELDS, CHARTERED
101 S. Capitol Boulevard, 10th Floor
Post Office Box 829
Boise, Idaho 83701
Telephone: (208) 345-2000
Facsimile: (208) 385-5384
18946.26

RECEIVED
JUL 17 2003
Givens Pursley, LLP

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE (CONSISTING OF 99 APPLICATIONS FOR TRANSFERS OF WATER RIGHTS, AND 13 APPLICATIONS FOR AMENDMENT OF PERMITS) IN THE NAME OF UNITED WATER IDAHO, INC.	**SETTLERS IRRIGATION DISTRICT'S RESPONSES TO UWID'S FIRST SET OF DISCOVERY REQUESTS TO SETTLERS IRRIGATION DISTRICT**

Settlers Irrigation District ("Settlers") hereby responds to UWID's First Set of Discovery Requests to Settlers Irrigation District, pursuant to the Idaho Rules of Civil Procedure, the Idaho Department of Water Resources' Rules of Procedure, and the Hearing Officer's Third PreHearing Order.

GENERAL OBJECTIONS

1. Settlers has not completed its own investigations and/or discovery. Accordingly, the responses that follow are based upon the best knowledge, information, and

belief of Settlers at this time. Settlers reserves the right to make any further responses if it appears that any omission or error has been made in connection with these responses or that more accurate information is or has become available. These responses are made without prejudice to Settlers' right to use in later discovery or to present at trial, such evidence as may later be discovered or evaluated.

2. Settlers objects to the definitions and instructions to the extent they purport to require discovery requests beyond that required under the Idaho Rules of Civil Procedure. These responses are provided in accordance with the Idaho Rules of Civil Procedure irrespective of any definitions and instructions that may accompany these discovery requests.

3. These responses are made subject to all objections as to competence, relevance, materiality, and admissibility. These 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 trial.

4. Settlers 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. Settlers has, to the extent possible, construed each request as requesting only information and/or documents not subject to any applicable protection.

5. No incidental or implied admissions are intended. The fact that Settlers has responded to any discovery request or part thereof should not be taken as an admission that Settlers accepts that the discovery request or the response or objection thereto constitutes admissible evidence. Similarly, the fact that Settlers has responded to all or part of an interrogatory is not intended to and shall not be construed to be a waiver by Settlers of all or part of any objection to other interrogatories. Settlers' answers to any discovery requests herein do not constitute a waiver of Settlers' right to object to any future additional, or supplemental discovery requests regarding the same or similar matter.

6. Settlers further objects to these discovery requests because they appear to attempt to separate out the transfer component of the IMAP from the applications for permit, and from the other significant legal issues involved in the IMAP, including but not limited to the appropriateness of an integrated points of diversion system, the appropriateness of a fifty year planning horizon and the applicability of the forfeiture doctrine to municipal water rights. UWID has consistently maintained that this is an "Integrated Municipal Application Package," and Settlers maintains that it is impossible to consider the transfers of water rights contained within that package prior to and apart from the significant legal issues (as well as others) just described.

RESPONSES TO INTERROGATORIES, REQUESTS FOR ADMISSION AND REQUESTS FOR PRODUCTION OF DOCUMENTS

INTERROGATORY NO. 1: Please identify yourself (the person responding to these discovery requests) and state your relationship with the District.

RESPONSE TO INTERROGATORY NUMBER 1: Tom Davis. Mr. Davis is the Vice-President of the Board of Directors of Settlers Irrigation District. Scott L. Campbell and Angela Schaer Kaufmann, counsel for Settlers, assisted Mr. Davis in preparing these responses.

INTERROGATORY NO. 2: Please identify each and every person with whom you consulted in preparing these responses.

RESPONSE TO INTERROGATORY NUMBER 2: See Response to Interrogatory Number 1.

INTERROGATORY NO. 3: Please identify each and every witness the Protestant intends to call (or may call) at the hearing in this matter. With respect to each of the witnesses so identified, please identify the person as a fact or expert witness, and state the subject matter and general substance of the facts and opinions to which he or she is expected to testify.

RESPONSE TO INTERROGATORY NUMBER 3: Objection. Discovery is still in its early stages, and Settlers has not yet fully determined who it may call as a witness in this matter. Moreover, the Hearing Officer has not yet set a deadline for disclosure of witnesses. Subject to, and without waiving that objection, and reserving its right to disclose witnesses in accordance with the Hearing Officer's scheduling order(s), Settlers states that it may call the following individuals as fact witnesses:

Nathan Draper, Manager
Settlers Irrigation District
P.O. Box 7571
Boise, ID 83707

Richard E. Allen, Board President
Settlers Irrigation District
P.O. Box 7571
Boise, ID 83707

Ken Aschenbrenner, Board Member
Settlers Irrigation District
P.O. Box 7571
Boise, ID 83707

Tom Davis, Board Member
Settlers Irrigation District
P.O. Box 7571
Boise, ID 83707

Each of the witnesses described above may testify regarding the effect of the IMAP upon Settlers' water rights, and the effect of the IMAP on the local public interest.

Settlers may also call the following expert witness: Don Reading of Ben Johnson Associates, Inc., 6070 Hill Road, Boise, ID 83703. Mr. Reading is expected to testify regarding the methodology and validity of the data used and conclusions reached by Mr. John Church.

Settlers further reserves the right to examine each and every witness, whether fact or expert, who may be called by any other party in the above captioned matter.

INTERROGATORY NO. 4: Please identify each and every consultant or expert who has been consulted in connection with this proceeding or who has been employed, retained or engaged by the Protestant in connection with this matter. With respect to each of the persons so identified, please indicate the nature and purpose of their work as it relates to this proceeding, and indicate whether the person is expected to be called as a witness.

RESPONSE TO INTERROGATORY NUMBER 4: Objection. This interrogatory calls for material protected by the attorney-client privilege and the work product doctrine, and is not discoverable under Idaho Rule of Civil Procedure 26(B)(4)(b).

INTERROGATORY NO. 5: Please identify and describe each exhibit which the Protestant intends to introduce or utilize at the time of the hearing on the above action.

RESPONSE TO INTERROGATORY NUMBER 5: Objection. This interrogatory calls for material protected by the attorney-client privilege and work product doctrine. In addition, the Hearing Officer has not yet set a deadline for disclosure of exhibits. Subject to, and without waiving those objections, Settlers has not yet determined what exhibits it will introduce at the hearing in this matter. Settlers will supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's scheduling order(s).

INTERROGATORY NO. 6: Please describe in full, complete and material detail all statements and/or admissions relevant to the issues contested in this proceeding which the Protestant attributes to the Applicant or those speaking for the Applicant or in support of the Applicant's application. For each such statement or admission please state: (a) the substance thereof; (b) the identity of the person making the statement or admission; (c) the date and/or place where said admission was made; and (d) the identity of each and every person who heard, saw or observed each such statement or admission.

RESPONSE TO NO. INTERROGATORY NO. 6: Objection. This interrogatory is vague, ambiguous, overbroad, and compound. Subject to, and without waiving those objections, Settlers states that it may use any statements or admissions made by UWID, including its counsel, employees, officers, directors, consultants, agents, and any others ("UWID") with actual or apparent authority to speak on behalf of UWID in the following contexts:

a) the IMAP,

b) any documents which UWID has disclosed in response to any of the Protestants' informal requests for information,

c) any written statements UWID has disclosed in response to any of the Protestants' informal requests for information,

d) any statements made by or on behalf of UWID at any hearing in this matter,

e) any statements UWID makes in any pleadings filed or discovery responses served in this matter,

f) any statements UWID makes in any depositions taken in this matter,

g) any statements made in any correspondence to Settlers, its counsel, or consultants,

h) any statements made or reported in any news publication or report, whether written or oral.

Settlers reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's orders.

INTERROGATORY NO. 7: Please state each and every basis for the Protestant's protest.

RESPONSE TO INTERROGATORY NUMBER 7: Objection. This interrogatory calls for material protected by the attorney-client privilege and work product doctrine. Moreover, the protest speaks for itself. Subject to, and without waiving those objections, Settlers refers UWID to its statement of the issues provided in this matter, as well as its initial response to Requests for Information, contained in correspondence from Scott L. Campbell to Christopher Meyer and John Marshall, dated May 27, 2003.

Settlers notes that discovery in this matter is ongoing, as is Settlers' analysis of the issues and pertinent facts. Settlers reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR ADMISSION NO. 1: Please admit that the transfers included in the Application will not injure other water rights within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 1: Denied.

REQUEST FOR ADMISSION NO. 2: Please admit that the transfers included in the Application will not result in enlargement of the water rights proposed for transfer within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 2: Denied.

REQUEST FOR ADMISSION NO. 3: Please admit that the transfers included in the Application are consistent with the "conservation of water within the state of Idaho" within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 3: Settlers is without sufficient knowledge and information to respond to this request for admission and, therefore, denies the same.

REQUEST FOR ADMISSION NO. 4: Please admit that the transfers included in the Application will not "significantly affect the agricultural base of the local area" within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 4: Denied.

REQUEST FOR ADMISSION NO. 5: Please admit the transfers included in the Application are within the local public interest within the meaning of Idaho Code § 42-222(1).

RESPONSE TO REQUEST FOR ADMISSION NUMBER 5: Denied.

INTERROGATORY NO. 8: If your response to any of the Requests for Admission Numbers 1 through 5 was other than an unqualified admission, then for each such Request for Admission, please state with specificity each and every reason, fact, or opinion of which you are aware that prevents your unqualified admission.

RESPONSE TO INTERROGATORY NUMBER 8: Objection. This interrogatory is compound and, in reality, constitutes five separate interrogatories. Settlers further states that neither discovery nor its investigation of this matter is complete. Further, this interrogatory calls for material protected by the attorney-client and work product privileges. Finally, Settlers objects on the basis that it is UWID's burden to affirmatively prove each and every element of Idaho Code section 42-222(1), and not Settlers' burden to disprove those elements.

Subject to, and without waiving those objections, Settlers states as follows:

1. As to Request for Admission Number 1 and its denial of the same, the transfers included in the Application will injure other water rights due to their contemplated incorporation and use of the integrated points of diversion system.

2. As to Request for Admission Number 2 and its denial of the same, the transfers may result in enlargement of the water rights due to the use of the integrated points of diversion system, and use of individual water rights in excess of the permitted, licensed, or decreed elements of those rights.

3. As to Request for Admission Number 3, Settlers denied the same because it was without sufficient knowledge and information to answer that request for admission.

4. As to Request for Admission Number 4, if UWID is allowed to retain its current water rights, even though it admits that it does not currently use the entire quantity available under those paper water rights, and particularly if UWID is allowed to acquire water rights significantly in excess of current demand or demand projected in the reasonably near future, the agricultural base of the local area may be harmed because those involved in

agriculture may find themselves unable to acquire water rights due to UWID's senior but unused water rights.

5. As to Request for Admission Number 5, the transfers and the IMAP will not be in the local public interest because they will allow UWID to hold water rights in excess of current demand and use, thereby, tying up the public water resource. Further, the integrated points of diversion system will not be in the local public interest because it may lead to increased drawdowns in areas of certain wells, as well as increased impacts to surface water sources.

INTERROGATORY NO. 9: What is the total quantity of water available to the District under its water rights?

RESPONSE TO INTERROGATORY NUMBER 9: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence. It is also ambiguous as to the phrase "total quantity of water available."

INTERROGATORY NO. 10: Please describe and quantify the hydrologic impact on the District's water rights which is likely to result if the Application were approved.

RESPONSE TO INTERROGATORY NUMBER 10: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 11: Please describe and quantify the financial impact on the District which is likely to result if the Application were approved.

RESPONSE TO INTERROGATORY NUMBER 11: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 12: Please state whether the District has a water conservation program in effect today. Please describe in full the District's water conservation efforts or program. Please include a discussion of the history and development of the efforts or program.

RESPONSE TO INTERROGATORY NUMBER 12: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 13: Please identify, describe and summarize the results of all studies, by the District or others, assessing or evaluating the success of the District's water conservation efforts.

RESPONSE TO INTERROGATORY NUMBER 13: See Response to Interrogatory Number 12.

INTERROGATORY NO. 14: Please provide a quantification of water use by each user group served by the District for which the District keeps separate records. For example, if the District keeps records based on agricultural, commercial or domestic users, please provide a breakdown showing the total quantity of use for each group.

RESPONSE TO INTERROGATORY NUMBER 14: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 15: Please identify which of the Applicant's water rights included in the Application have been forfeited. For each water right identified, please state all the facts upon which you base your contention that the right has been forfeited.

RESPONSE TO INTERROGATORY NUMBER 15: Objection. Settlers has not been able to fully make this determination because UWID continues to refuse to provide the information which Settlers first requested in November 2002. Moreover, the Hearing Officer has ordered that the information requested in this interrogatory be disclosed on or before September 12, 2003, after discovery is closed. Subject to, and without waiving that objection, Settlers' analysis in this regard is ongoing and has not been completed.

Settlers reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's Third PreHearing Order.

INTERROGATORY NO. 16: Does the District disagree with the methodology used by Mr. Church and the conclusion he reached in creating the population and water demand projections in the Application? Please identify any such disagreements and explain.

RESPONSE TO INTERROGATORY NUMBER 16: Settlers continues to review and refine its analysis of Mr. Church's methodology and conclusions, and has not yet reached conclusions of its own. Settlers will supplement this response in accordance with the Idaho Rules of Civil Procedure and the Hearing Officer's Third PreHearing Order.

INTERROGATORY NO. 17: You have stated in responses to informal information requests that the Applicant's planning area is speculative and in conflict with the Municipal Water Rights Act of 1996.

RESPONSE TO INTERROGATORY NUMBER 17: Objection. No question was asked.

INTERROGATORY NO. 18: Explain why the District believes the Applicant should have a planning horizon for a maximum of 25 years.

RESPONSE TO INTERROGATORY NUMBER 18: The ***maximum*** planning horizon should be 25 years because, upon information and belief, that is the maximum period of time for which cities, counties and local agencies plan. Any period of time beyond 25 years renders projections such as population and water demand speculative and completely unreliable.

INTERROGATORY NO. 19: What plans does the District have to annex new lands?

RESPONSE TO INTERROGATORY NUMBER 19: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 20: How many pressurized, residential irrigation systems or hook-ups does the District serve? (This interrogatory does not inquire as to the number of individual lots or parcels served by Settlers [ ) sic].

RESPONSE TO INTERROGATORY NUMBER 20: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this

interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 21: Please explain how you quantify and track residential irrigation water use?

RESPONSE TO INTERROGATORY NUMBER 21: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 22: What is the average annual per capita usage in volume of water per irrigated acre and per customer for your members who use water for residential irrigation?

RESPONSE TO INTERROGATORY NUMBER 22: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 23: Has the District undertaken any planning for projected future water demands? If so, explain what it has done in this regard, who did or is doing the work, what the status of the work is, and what conclusions or tentative conclusions have been reached.

RESPONSE TO INTERROGATORY NUMBER 23: Objection. This interrogatory seeks information which is irrelevant to the IMAP proceeding, and this

interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 1: Please produce any and all documents which bear upon or provide evidence with respect to the decision by the District to file a protest in this matter. This Request for Production seeks production by the District of documents which include, but are not limited to, official minutes of any regular or special meeting of the District Council or its members, and all resolutions, ordinances, policies, directives, or other formal or informal actions of the District with respect to the District's protest of this water right transfer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Objection. Calls for material protected by the attorney-client privilege and work product doctrines. Subject to, and without waiving that objection, see the documents attached hereto.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents displaying the hydrologic impact that the Application would have on the District's water rights if the Application were approved.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: Settlers has no such responsive documents at this time. Settlers reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 3: Please produce all documents concerning the District's water conservation efforts or program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: See Response to Interrogatory Number 12.

REQUEST FOR PRODUCTION NO. 4: Please produce all documents concerning the District's evaluation of the Applicant's planning area.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: Objection. Calls for material protected by the attorney-client privilege and work product doctrine. Subject to, and without waiving that objection, Settlers states that the responsive documents are those which have been provided by UWID to Settlers in response to Settlers' informal requests for information. Settlers reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 5: Please produce all documents concerning the District's evaluation of the Applicant's planning horizon.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Objection. Calls for material protected by the attorney-client privilege and work product doctrine. Subject to, and without waiving that objection, Settlers states that the responsive documents are those which have been provided by UWID to Settlers in response to Settlers' informal requests for information. Settlers reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

REQUEST FOR PRODUCTION NO. 6: Please produce all documents concerning the District's evaluation of forfeiture of any of Applicant's water rights.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Objection. Calls for material protected by the attorney-client privilege and work product doctrine. Subject to, and without waiving that objection, Settlers states that the responsive documents are those which have been provided by UWID to Settlers in response to Settlers' informal requests for

information. Settlers reserves the right to supplement this response in accordance with the Idaho Rules of Civil Procedure.

DATED this 17th day of July 2003.

MOFFATT, THOMAS, BARRETT, ROCK & FIELDS, CHARTERED

By _____
Scott L. Campbell - Of the Firm

By _____
Angela Schaer Kaufmann - Of the Firm
Attorneys for Pioneer Irrigation District
and Settlers Irrigation District

DATED this 16th day of July 2003.

By Tom Davis
Tom Davis, Board Vice-President
Settlers Irrigation District

STATE OF IDAHO)
) ss.
County of Ada)

On this 16th day of July 2003, before me, the undersigned notary public in and for said state, personally appeared **TOM DAVIS**, Vice-President of the Board of Directors of **SETTLERS IRRIGATION DISTRICT**, an irrigation district organized and existing under and by virtue of the laws of the State of Idaho, known or identified to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he has the authority to execute and executed the same for the purposes therein contained on behalf of **SETTLERS IRRIGATION DISTRICT.**

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal the day and year in this certificate first above written.

VICKI R. KEEN NOTARY PUBLIC STATE OF IDAHO

Vicki R. Keen
NOTARY PUBLIC FOR IDAHO
Residing at Boise, Idaho
My Commission Expires 5/21/2005

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of July 2003, I caused a true and correct copy of the foregoing **SETTLERS IRRIGATION DISTRICT'S RESPONSES TO UWID'S FIRST SET OF DISCOVERY REQUESTS TO SETTLERS IRRIGATION DISTRICT** to be served by the method indicated below, and addressed to the following:

Director Idaho Department of Water Resources 1301 N. Orchard Street PO Box 83720 Boise, ID 83720 Fax: 327-5400	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Peter Anderson, Hearing Officer 729 W. Braemere Road Boise, ID 83702	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Gary L. Spackman, Regional Manager Idaho Department of Water Resources Western Region Office 2735 Airport Way Boise, ID 83705 Fax: 334-2348	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
United Water Idaho Inc. John M. Marshall Givens Pursley, LLP PO Box 2720 Boise, ID 83701 Fax: 388-1300	( ) U.S. Mail, Postage Prepaid (X) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Nampa & Meridian Irrigation District, City of Meridian, City of Caldwell, Terteling Company, and Terteling Trust No. 7 Charles L. Honsinger Ringert Clark 455 South 3rd Street PO Box 2773 Boise, ID 83701-2773 Fax: 342-4657	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile

City of Boise
Matthew Wilde
Boise City Attorney's Office
PO Box 500
Boise, ID 83701-0500
Fax: 384-4454

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Josephine P. Beeman
Beeman & Associates P.C.
409 W. Jefferson Street
Boise, ID 83702
Fax: 331-0954

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

City of Boise
Boise Public Works Department
Beth K. Baird
Environmental Programs Coordinator
150 N. Capitol Blvd.
PO Box 500
Boise, ID 83701-0500
Fax: 384-3905

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Boise Project Board of Control
Albert P. Barker
Barker Rosholt & Simpson
PO Box 2139
Boise, ID 83701-2139
Fax: 342-4657

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Bureau of Reclamation
E. Gail McGarry, PN-3100
1150 N. Curtis Road, Suite 100
Boise, ID 83706-1234
Fax: 378-5019

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Kathleen M. Carr
U.S. Department of the Interior
Office of the Solicitor
Pacific Northwest Region , Boise Field Office
550 West Fort Street, MSC 020
Boise, ID 83724-0020
Fax: 334-1378

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Estate of Eleanor I. Chase Matt J. Howard PO Box 190012 Boise, ID 83719 Fax: 333-8409	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Cities of Eagle, Kuna, Middleton & Star and Star Sewer District Bruce M. Smith Tammy A. Zokan Moore Smith Buxton & Turcke 225 N. 9th Street, Suite 420 Boise, ID 83702 Fax: 331-1202	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
City of Meridian Public Works Gary D. Smith 660 E. Watertower Meridian, ID 83642 Fax: 887-1297	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
City of Caldwell Engineering Department Gordon Law 621 E. Cleveland Blvd. Caldwell, ID 83605 Fax: 455-3003	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Ed Squires Hydrologic 1002 W. Franklin Boise, ID 83702-5431 Fax: 342-3100	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile
Robert W. Talboy Ellsworth Kallas Talboy, PLLC 2402 W. Jefferson Street Boise, ID 83702 Fax: 345-8945	(X) U.S. Mail, Postage Prepaid ( ) Hand Delivered ( ) Overnight Mail ( ) Facsimile

Mr. Michael Chase
70 W. Floating Feather Road
Eagle, ID 83616-3802

(X) U.S. Mail, Postage Prepaid
( ) Hand Delivered
( ) Overnight Mail
( ) Facsimile

Scott L. Campbell

COPY

MINUTES

A regular meeting of Settlers Irrigation District was called to order October 1, 2002 at 1:00 p.m. Those attending were Richard Allen, President; Tom Davis Vice President, Ken Aschenbrenner, Director; Vicki Keen, Secretary/Treasurer; Nathan Draper, Manager; and Scott Campbell, attorney.

The minutes of the September 2002 meeting were read, approved, and signed.

Vicki presented the expenses for September and the Board approved them. Expenses were $30,484.14 and Income was $1,310.03.

Nathan presented revised plans for Bridgetower #2. He wants the developers to relocate the White Drain tile to avoid encroachment of the easement by the pressurized irrigation pond. In addition, the proposed pathway through the development will require the Drain to have a 4:1 slope which will make cleaning the Drain difficult. In fact, NMID, who has historically cleaned the drain, will not assume the liability of doing so in the future if the pathway is constructed. Since Settlers' does not not have the proper equipment to clean it, Nathan will discuss the problem with Becky.

Connie Wensman, 2273 Ribier Drive, Meridian, Idaho, Lot 2 of Almaden Acres, would like to Annex into the District. She is requesting 4.26 miner's inches of water for the property which would be pumped from the private ditch that runs through the subdivision. She has requested permission from the Almaden Acres Property Owners' Association. The Board approves of the annexation if she can obtain permission from the other water users on the ditch. Vicki will contact her and relay the information. If her request is granted, the legal notice will be published in the Statesman for two weeks and if there is no objection to the annexation, Vicki will prepare the Order to be recorded with the County.

Nathan reported that we have approximately 6,384 acre feet of Lucky Peak water remaining in the reservoir.

Nathan met with Brian Sauer of the Bureau of Reclamation to tour the District and determine how the $15,000 of matching funds will be used. They decided that replacing flumes is the best use of the money at this time.

Scott met with the Bureau of Reclamation yesterday to discuss the Lucky Peak Contract Renewal. Negotiations are going slowly, but they are working to get the Environmental Assessment completed before the end of the year.

Scott attended a meeting in Washington, D.C. to discuss the Nez Perce issue. Nothing was resolved and the whole process may come to a halt.

Scott Rhead with United Water attended the meeting to discuss with the Board the SRBA and how the resulting water rights allocation will affect the Boise Valley. He wanted to give assurance that United Water is not trying and will not try to take water rights away from the District. They would like to establish trust and work together to supply the water needs for agriculture and residential. He would like to start a dialogue with the Board to get and give feedback to resolve the issues.

As there was no further business, the meeting was adjourned at 3:00 p.m.

Respectfully submitted,

Vicki R. Keen, Secretary/Treasurer

Richard Allen, President

EXHIBIT B

GIVENS PURSLEY LLP

LAW OFFICES
277 North 6th Street, Suite 200
PO Box 2720, Boise, Idaho 83701
TELEPHONE: 208 388-1200
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Gary G. Allen
Christopher J. Beeson
Jessica M. Borup
William C. Cole
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Emily MacMaster Durkee
Thomas E. Dvorak
Roy Lewis Eiguren
Timothy P. Feamside
Jeffrey C. Fereday
Steven J. Hippler
Karl T. Klein
Debora K. Kristensen
Anne C. Kunkel
Deborah E. Nelson
Franklin G. Lee
David R. Lombardi
D. David Lorello, Jr.
Kimberly D. Maloney
John M. Marshall
Kenneth R. McClure
Kelly Greene McConnell
Cynthia A. Melillo
Christopher H. Meyer
Kendall L. Miller
L. Edward Miller
Patrick J. Miller
Judson B. Montgomery
Angela K. Nelson
W. Hugh O'Riordan
Michael C. Orr
Kenneth L. Pursley
Bradley V. Sneed
H. Barton Thomas
Conley E. Ward
Robert B. White

Raymond D. Givens
James A. McClure
Stephanie C. Westermeier
OF COUNSEL

John A. Miller, LL.M. *
TAX CONSULTANT

*Licensed in Kentucky only

July 29, 2003

VIA FACSIMILE

Scott L. Campbell, Esq.
Moffatt Thomas Barrett Rock & Fields, Chtd.
101 S. Capitol Blvd., 10th Floor
P.O. Box 829
Boise, ID 83701-0829

Re: In The Matter of Integrated Municipal Application Package ("IMAP") of United Water Idaho Inc.
Our File No. 30-71

Dear Scott:

Your clients have declined to respond to Interrogatory Numbers 10, 12, 13, 14, 19, 20, 21, 22, and 23, contending they are not relevant to this proceeding. Your clients also have declined to provide the information requested in Interrogatory Numbers 15 and 16 on grounds that their analysis is not complete. Our reasons for why these interrogatories are relevant and why currently available information, even if preliminary, is required are explained in the attached draft *Motion to Compel Responses to UWID's First Set of Discovery Requests to Pioneer Irrigation District and Settlers Irrigation District*. We hope this provides the interpretation and explanation you require. If your responses are not forthcoming by the end of this week, we will file the motion with the Hearing Officer.

Sincerely,

John M. Marshall

Enclosure
JMM/lp
S:\CLIENTS\30\71\UM Ltr-0004.DOC

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
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Email: chrismeyer@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S MOTION TO COMPEL RESPONSES TO UWID'S FIRST SET OF DISCOVERY REQUESTS TO PIONEER IRRIGATION DISTRICT AND SETTLERS IRRIGATION DISTRICT.**

MOTION

United Water Idaho Inc. hereby moves for an order compelling responses to discovery from protestants Pioneer Irrigation District and Settlers Irrigation District. This motion is brought pursuant to Procedure Rule 522.

SUMMARY

On July 2, 2003 United Water served Pioneer Irrigation District and Settlers Irrigation District (collectively the "Districts") with United Water's first set of discovery requests. United Water received the Districts' responses on July 17, 2003. Copies of both responses are attached to the Affidavit of John M. Marshall filed herewith.

With respect to Interrogatory Numbers 10, 12, 13, 14, 19, 20, 21, 22, and 23, the Districts

have declined to respond on grounds that the "interrogatory seeks information which is irrelevant to the IMAP proceeding, and this interrogatory furthermore is not reasonably calculated to lead to the discovery of admissible evidence." With respect to Interrogatories 15 and 16, the Districts have declined to provide the requested information on grounds that their analysis is ongoing. On July 28, 2003, United Water wrote to counsel for Pioneer and Settlers demanding answers to the interrogatories identified above. Pioneer and Settlers continue to refuse to answer. Consequently, United Water brings this motion.

ARGUMENT

The sole issue presented with respect to Interrogatory Numbers 10, 12, 13, 14, 19, 20, 21, 22, and 23 is whether the interrogatories seek relevant information and/or information that is not reasonably calculated to lead to the discovery of admissible evidence. This motion takes up each interrogatory in turn.

Interrogatory Number 10 asks the Districts to "describe and quantify the hydrologic impact on the District's water rights which is likely to result if the [IMAP] were approved." This interrogatory goes to the question of injury to other water rights.

The Districts themselves have recognized this is a relevant issue. In Response to Interrogatory No. 8, the Districts raise the injury question: "the Application will injure other water rights due to their contemplated incorporation and use of the integrated points of diversion system." Moreover, in its Statements of Issues No. 12, they state that the "IMAP does not adequately protect senior water rights (whether ground or surface water, and not just from well interference)."

Because injury to other water rights is unquestionably an issue in these proceedings, it cannot reasonably be argued that inquiry into the hydrologic effects of the Application on the

Districts' water rights is irrelevant and not calculated to lead to the discovery of admissible evidence. The Districts should be compelled to answer.

Interrogatory Nos. 12 and 13 ask the Districts for information about its conservation efforts or programs. Conservation has been raised as an issue in this proceeding. For example, in the Boise Project's Statement of Issues, it identifies as an issue "whether United Water's future needs claim is inconsistent with the conservation of water in the state, in that no water conservation, xeriscape or other similar measures are factioned [sic] into the calculations for future needs." Idaho Rule of Civil Procedure 26(b)(1) states that discovery may be had regarding any matter that "relates to the claim or defense of any other party." Because conservation is an issue, United Water is entitled to understand how protestants have approached the issue with regard to their water rights.

Moreover, the Districts themselves have denied United Water's request for admission that the IMAP transfers are consistent with the conservation of water resources within the state of Idaho. Conservation is a relevant issue in this proceeding and the Districts must be made to answer United Water's questions on the subject.

Interrogatory Number 14 requests information on the quantification of the Districts' water use. This information is relevant to consideration of the Districts' claims of potential injury and allegations that the IMAP is not in the public interest because it will allow United Water to "hold water rights in excess of current demand and use, thereby, [sic] tying up the public water resource." Response to Interrogatory No. 8.

To evaluate the Districts' claims, United Water is entitled to know the extent of their water use.

Interrogatory Number 19 asks the Districts about their plans to annex new lands. This

request is relevant to the issue raised by the Boise Project in its Statement of Issues that "irrigation districts should be providing water for irrigation of the areas United Water claims it will irrigate, including retrofit of areas currently supplied by United Water." To evaluate this claim, United Water is entitled to know whether irrigation districts have plans to annex lands within United Water's planning area.

Interrogatory Nos. 20 through 22 explore the irrigation issue raised by protestants by seeking information about the quantity of water the Districts use to serve lawn irrigation demands. The requests are further relevant to claims that the IMAP will tie up the public resource by exploring whether the Districts and others have sufficient water rights to supply the irrigation uses within their systems.

Interrogatory No. 23 asks whether the District has done any planning for future demands. This question clearly is relevant given the Districts' protests that challenge the planning process undertaken by United Water. The Districts have challenged United Water's proposed planning horizon and its planning area, arguing the horizon is too long and the area too large. Because these issues have been raised, the extent to which other entities, including the Districts, have undertaken any future water planning is relevant. The request is further relevant to the Districts' claim that United Water will tie up the water resource. To evaluate this claim, United Water is entitled to know what others' have planned for water development. The Hearing Officer should compel an answer.

Interrogatory Numbers 15 and 16. The Districts also have refused to provide the information requested in Interrogatory Numbers 15 and 16. Interrogatory 15 asks the District to identify which of United Water's rights they contend are forfeited and to provide the supporting facts. Interrogatory 16 asks the Districts to identify their disagreements with the analysis used by

John Church in the IMAP. In their answers to each, the Districts contend their analysis is ongoing, and on this basis, provide no information. It may be true that the Districts have not completed their analyses, but this is not justification for withholding information they currently have. United Water is entitled to know what the Districts have at this time. The Hearing Officer should compel the Districts to provide United Water with currently available information responsive to these requests.

Respectfully submitted this ___ day of July, 2003.

GIVENS PURSLEY LLP

By: _____
Christopher H. Meyer

By: _____
John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

EXHIBIT C

Boise
Idaho Falls
Pocatello

Moffatt Thomas
MOFFATT THOMAS BARRETT ROCK & FIELDS, CHTD.

Eugene C. Thomas
John W. Barrett
R. B. Rock
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D. James Manning
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July 29, 2003
Via Facsimile

John M. Marshall
Givens Pursley LLP
277 North 6th Street, Suite 200
P. O. Box 2720
Boise, Idaho 83701-2720

Re: IMAP
Potential Motion to Compel
MTBR&F File No. 18-946.26

Dear John:

Scott and I have reviewed the correspondence you faxed to us this morning, along with your proposed motion to compel. After reviewing the same, we continue to believe that we have a solid foundation for our objections on the basis of relevance. Therefore, if you still feel the information you seek is relevant and important to the IMAP, it appears that this matter would best be resolved via your motion to compel.

Very truly yours,

Angela Schaer Kaufmann

Angela Schaer Kaufmann

ASK/kcp

RECEIVED
AUG - 4 2003
Department of Water Resources

GIVENS PURSLEY LLP

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OF COUNSEL

John A. Miller, LL.M. *
TAX CONSULTANT

*Licensed in Kentucky only

August 1, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of UWID's Notice of Service of UWID's Responses to Pioneer Irrigation District and Settlers Irrigation District's First Set of Discovery Requests to United Water Idaho Inc. Please conform the copy and return it to our office in the enclosed self-addressed, stamped envelope.

Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing NOS - UWID Response to Pioneer & Settlers.DOC

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AUG - 4 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF UWID'S RESPONSES TO PIONEER IRRIGATION DISTRICT AND SETTLERS IRRIGATION DISTRICT'S FIRST SET OF DISCOVERY REQUESTS TO UNITED WATER IDAHO INC.**

On behalf of Applicant United Water Idaho Inc., I, Christopher H. Meyer of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestants Pioneer Irrigation District and Settlers Irrigation District a true and correct copy of UWID's Response to Pioneer Irrigation District and Settlers Irrigation District's First Set of Discovery Requests to United Water Idaho Inc. by mailing the same to their counsel of record: Scott L. Campbell, Moffatt Thomas Barrett Rock & Fields, 101 S. Capital Blvd., 10th Floor, P.O. Box 829, Boise, Idaho 83701-0829

Respectfully submitted this 1st day of August, 2003.

GIVENS PURSLEY LLP

By: Christopher H. Meyer

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of August, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Christopher H. Meyer

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JUL 23 2003
Department of Water Resources

GIVENS PURSLEY LLP

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July 21, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of UWID's Notice of Service of First Discovery Requests to Boise-Kuna Irrigation District. Please conform the copy and return it to our office in the enclosed self-addressed, stamped envelope. - done 7/23 dg

Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing NOS-Boise-Kuna Requests.DOC

RECEIVED
JUL 23 2003
Department of Water Resources

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
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Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO BOISE-KUNA IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Boise-Kuna Irrigation District a true and correct copy of UWID's First Set of Discovery Requests to Boise-Kuna Irrigation District by mailing the same to their counsel of record: Albert P. Barker, Barker, Rosholt & Simpson, 205 North 10th, Suite 520, P.O. Box 2139, Boise, ID 83701-2139 and Robert W. Talboy, Ellsworth, Kallas & Talboy, PLLC, 2402 West Jefferson Street, Boise, ID 83702.

Respectfully submitted this 21st day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq.
Hearing Officer
729 W. Braemere Rd.
Boise, ID 83702

✓ U.S. Mail
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Gary L. Spackman
Regional Manager
Idaho Department of Water Resources
Western Regional Office
2735 Airport Way
Boise, ID 83705

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Kathleen Marion Carr, Esq.
Office of the Field Solicitor
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550 West Fort Street
Boise, ID 83724

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Mr. Edward Squires
Hydro Logic, Inc.
1002 West Franklin St.
Boise, ID 83702-5431

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E. Gail McGarry, P.E.
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Water Rights & Acquisitions
PN-3100
U.S. Bureau of Reclamation
Pacific Northwest Region
1150 N. Curtis Road
Boise, ID 83706-1234

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Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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John M. Marshall

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Department of Water Resources

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Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO NAMPA AND MERIDIAN IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Nampa and Meridian Nampa & Meridian Irrigation District by mailing the same to their counsel of record: Charles L. Honsinger, Ringert Clark, Chtd., 455 S. Third Street, P.O. Box 2773, Boise, Idaho 83701-2773.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

✓ U.S. Mail
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_____ Hand Delivery
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
JUL - 2 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO CITY OF BOISE**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant City of Boise a true and correct copy of UWID's First Set of Discovery Requests to City of Boise by mailing the same to their counsel of record: Matthew K. Wilde, Boise City Attorney's Office, 150 N. Capitol Blvd., P.O. Box 500, Boise, Idaho 83701-0500 and Josephine P. Beeman, Beeman & Associates PC, 409 West Jefferson, Boise, ID 83702-6049.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

✓ U.S. Mail
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John M. Marshall

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John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
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Boise, Idaho 83701-2720
Office: 208-388-1200
Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
JUL - 2 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO CITY OF MIDDLETON**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant City of Middleton a true and correct copy of UWID's First Set of Discovery Requests to City of Middleton by mailing the same to their counsel of record: Bruce M. Smith, Moore, Smith, Buxton & Turcke, Chtd., 225 North 9th Street, Suite 420, Boise, Idaho 83702.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

_____/ U.S. Mail
_____ Facsimile
_____ Hand Delivery
_____ Overnight Mail

John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
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Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO CITY OF STAR**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant City of Star a true and correct copy of UWID's First Set of Discovery Requests to City of Star by mailing the same to their counsel of record: Bruce M. Smith, Moore, Smith, Buxton & Turcke, Chtd., 225 North 9th Street, Suite 420, Boise, Idaho 83702.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

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_____ Facsimile
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

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Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO CITY OF CALDWELL**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant City of Caldwell a true and correct copy of UWID's First Set of Discovery Requests to City of Caldwell by mailing the same to their counsel of record: Charles L. Honsinger, Ringert Clark, Chtd., 455 S. Third Street, P.O. Box 2773, Boise, Idaho 83701-2773.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

✓ U.S. Mail
____ Facsimile
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

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Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO CITY OF MERIDIAN**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant City of Meridian a true and correct copy of UWID's First Set of Discovery Requests to City of Meridian by mailing the same to their counsel of record: Charles L. Honsinger, Ringert Clark, Chtd., 455 S. Third Street, P.O. Box 2773, Boise, Idaho 83701-2773.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

✓ U.S. Mail
_____ Facsimile
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: 208-388-1200
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

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JUL - 2 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO CITY OF EAGLE**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant City of Eagle a true and correct copy of UWID's First Set of Discovery Requests to City of Eagle by mailing the same to their counsel of record: Bruce M. Smith, Moore, Smith, Buxton & Turcke, Chtd., 225 North 9th Street, Suite 420, Boise, Idaho 83702.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

X U.S. Mail
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
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Counsel for Applicant United Water Idaho Inc.

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Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO CITY OF KUNA**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant City of Kuna a true and correct copy of UWID's First Set of Discovery Requests to City of Kuna by mailing the same to their counsel of record: Bruce M. Smith, Moore, Smith, Buxton & Turcke, Chtd., 225 North 9th Street, Suite 420, Boise, Idaho 83702.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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Josephine P. Beeman, Esq.
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409 West Jefferson
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John M. Marshall

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John M. Marshall, Esq. (Idaho Bar No. 5628)
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Office: 208-388-1200
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
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Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO BOISE PROJECT BOARD OF CONTROL**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Boise Project Board of Control a true and correct copy of UWID's First Set of Discovery Requests to Boise Project Board of Control by mailing the same to their counsel of record: Albert P. Barker, Barker, Rosholt & Simpson, 205 North 10th, Suite 520, P.O. Box 2139, Boise, ID 83701-2139.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

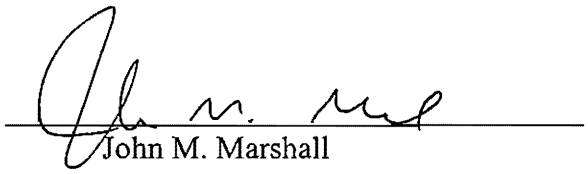
I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
Beeman & Associates PC
409 West Jefferson
Boise, ID 83702-6049

__X__ U.S. Mail
_____ Facsimile
_____ Hand Delivery
_____ Overnight Mail



John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Office: 208-388-1200
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
JUL - 2 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO STAR SEWER AND WATER DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Star Sewer and Water District a true and correct copy of UWID's First Set of Discovery Requests to Star Sewer and Water District by mailing the same to their counsel of record: Bruce M. Smith, Moore, Smith, Buxton & Turcke, Chtd., 225 North 9th Street, Suite 420, Boise, Idaho 83702.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Josephine P. Beeman, Esq.
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409 West Jefferson
Boise, ID 83702-6049

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_____ Facsimile
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John M. Marshall

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John M. Marshall, Esq. (Idaho Bar No. 5628)
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

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Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO BIG BEND IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Big Bend Irrigation District a true and correct copy of UWID's First Set of Discovery Requests to Big Bend Irrigation District by mailing the same to their counsel of record: Albert P. Barker, Barker, Rosholt & Simpson, 205 North 10th, Suite 520, P.O. Box 2139, Boise, ID 83701-2139.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Robert W. Talboy Ellsworth, Kallas & Talboy, PLLC 2402 West Jefferson Street Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Josephine P. Beeman, Esq.
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John M. Marshall, Esq. (Idaho Bar No. 5628)
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
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Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO WILDER IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Wilder Irrigation District a true and correct copy of UWID's First Set of Discovery Requests to Wilder Irrigation District by mailing the same to their counsel of record: Albert P. Barker, Barker, Rosholt & Simpson, 205 North 10th, Suite 520, P.O. Box 2139, Boise, ID 83701-2139.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Josephine P. Beeman, Esq.
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409 West Jefferson
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John M. Marshall

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Office: 208-388-1200
Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
JUL - 2 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO PIONEER IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Pioneer Irrigation District a true and correct copy of UWID's First Set of Discovery Requests to Pioneer Irrigation District by mailing the same to their counsel of record: Scott L. Campbell, Moffatt Thomas, Barrett, Rock, & Fields, Chtd., 101 S. Capital Blvd., 10th Floor, P.O. Box 829, Boise, Idaho 83701-0829.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Scott L. Campbell, Esq. Angela D. Schaer, Esq. Andrew J. Waldera, Esq. Moffatt Thomas Barrett Rock & Fields, Chartered 101 S. Capital Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Albert P. Barker, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson, LLP 205 North 10th, Suite 520 P.O. Box 2139 Boise, ID 83701-2139	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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Josephine P. Beeman, Esq.
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John M. Marshall

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Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
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Fax: 208-388-1300
Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO SETTLERS IRRIGATION DISTRICT**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Settlers Irrigation District a true and correct copy of UWID's First Set of Discovery Requests to Settlers Irrigation District by mailing the same to their counsel of record: Scott L. Campbell, Moffatt Thomas, Barrett, Rock, & Fields, Chtd., 101 S. Capital Blvd., 10th Floor, P.O. Box 829, Boise, Idaho 83701-0829.

Respectfully submitted this 2nd day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	X U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	X U.S. Mail _____ Facsimile _____ Hand Delivery _____ Overnight Mail
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Josephine P. Beeman, Esq.
Beeman & Associates PC
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Boise, ID 83702-6049

__X__ U.S. Mail
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John M. Marshall

GIVENS PURSLEY LLP

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PO Box 2720, Boise, Idaho 83701
TELEPHONE: 208 388-1200
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Gary G. Allen
Christopher J. Beeson
Jessica M. Borup
William C. Cole
Michael C. Creamer
Thomas E. Dvorak
Roy Lewis Eiguren
Timothy P. Feamside
Jeffrey C. Fereday
Steven J. Hippler
Karl T. Klein
Debora K. Kristensen
Anne C. Kunkel
Franklin G. Lee
David R. Lombardi
D. David Lorello, Jr.
Emily A. MacMaster
Kimberly D. Maloney
John M. Marshall
Kenneth R. McClure
Kelly Greene McConnell
Cynthia A. Melillo
Christopher H. Meyer
Kendall L. Miller
L. Edward Miller
Patrick J. Miller
Judson B. Montgomery
Angela K. Nelson
Deborah E. Nelson
W. Hugh O'Riordan
Michael C. Orr
Kenneth L. Pursley
Bradley V. Sneed
H. Barton Thomas
Conley E. Ward
Robert B. White

Raymond D. Givens
James A. McClure
Stephanie C. Westermeier
OF COUNSEL

John A. Miller, LL.M. *
TAX CONSULTANT

*Licensed in Kentucky only

RECEIVED
JUL -9 2003
Department of Water Resources

July 8, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Debbie:

Enclosed for filing in the IMAP matter please find the original and one copy of UWID's Notice of Service of First Discovery Requests to Bureau of Reclamation. Please conform the copy and return it to our office in the enclosed self-addressed, stamped envelope. done 7/9 dg

Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Katrina Thomas

Katrina Thomas
Legal Secretary

Enclosures

:kdt S:\CLIENTS\30\71\KT Ltr to IDWR re Filing NOS.DOC

Christopher H. Meyer, Esq. (Idaho Bar No. 4461)
John M. Marshall, Esq. (Idaho Bar No. 5628)
GIVENS PURSLEY LLP
277 North 6th Street, Suite 200
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Email: chm@givenspursley.com; jmm@givenspursley.com
Counsel for Applicant United Water Idaho Inc.

RECEIVED
JUL - 9 2003
Department of Water Resources

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO BUREAU OF RECLAMATION**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Bureau of Reclamation a true and correct copy of UWID's First Set of Discovery Requests to Bureau of Reclamation by mailing the same to their counsel of record: Kathleen Marion Carr, Office of the Field Solicitor, U.S. Department of the Interior, 550 West Fort Street, MSC 020, Boise, Idaho 83724-0020 and E. Gail McGarry, Pacific Northwest Region, U.S. Bureau of Reclamation, 1150 N. Curtis Road, Boise, Idaho 83706-1234.

Respectfully submitted this 8th day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

Bruce M. Smith, Esq. Tammy Zokan, Esq. Moore, Smith, Buxton & Turcke, Chtd. 225 North 9th St., Ste. 420 Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Matthew K. Wilde, Esq. Assistant City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Charles L. Honsinger, Esq. Daniel V. Steenson, Esq. Ringert Clark, Chart 455 S. Third Street P.O. Box 2773 Boise, ID 83701-2773	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
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July 14, 2003

Ms. Debbie Gibson
Idaho Department of Water Resources
1301 N. Orchard St.
P.O. Box 83720
Boise, ID 83720-0098

Re: United Water Idaho Inc.—IMAP
Our File No. 30-71

Dear Ms. Gibson:

Enclosed for filing in the IMAP matter please find the original and one copy of UWID's Notice of Service of First Discovery Requests to Terteling Entities. Please conform the copy and return it to our office in the enclosed self-addressed, stamped envelope.

Thank you for your assistance with this matter. If you have any questions or require any additional information please call.

Sincerely,

Lauren Paul
Legal Secretary

Enclosures

:ljp S:\CLIENTS\lp ltr to IDWR re filing NOS.DOC

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Counsel for Applicant United Water Idaho Inc.

BEFORE THE
IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF INTEGRATED MUNICIPAL APPLICATION PACKAGE ("IMAP") OF UNITED WATER IDAHO INC., BEING A COLLECTION OF INDIVIDUAL APPLICATIONS FOR TRANSFERS OF WATER RIGHTS AND APPLICATIONS FOR AMENDMENT OF PERMITS.	**UWID'S NOTICE OF SERVICE OF FIRST DISCOVERY REQUESTS TO TERTELING ENTITIES**

On behalf of Applicant United Water Idaho Inc., I, John M. Marshall of the firm Givens Pursley LLP, certify that on this date, I caused to be served upon Protestant Terteling Entities a true and correct copy of UWID's First Set of Discovery Requests to Terteling Entities by mailing the same to their counsel of record: Charles L. Honsinger, Esq., Ringert Clark, Chartered, 455 S. Third Street, P.O. Box 2773, Boise, ID 83701-2773.

Respectfully submitted this 14 day of July, 2003.

GIVENS PURSLEY LLP

By: John M. Marshall

Attorneys for Applicant
United Water Idaho Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of July, 2003, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Peter R. Anderson, Esq. Hearing Officer 729 W. Braemere Rd. Boise, ID 83702	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Gary L. Spackman Regional Manager Idaho Department of Water Resources Western Regional Office 2735 Airport Way Boise, ID 83705	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street Boise, ID 83724	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
Mr. Edward Squires Hydro Logic, Inc. 1002 West Franklin St. Boise, ID 83702-5431	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail
E. Gail McGarry, P.E. Program Manager Water Rights & Acquisitions PN-3100 U.S. Bureau of Reclamation Pacific Northwest Region 1150 N. Curtis Road Boise, ID 83706-1234	✓ U.S. Mail ____ Facsimile ____ Hand Delivery ____ Overnight Mail

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