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RECEIVED
MAY 29 2007
DEPT. OF WATER RESOURCES
SOUTHERN REGION

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

IN THE MATTER OF APPLICATION FOR)
AMENDMENT FOR WATER RIGHT NO.)
75-7052 and 75-7589 IN THE NAME OF)
WILLIAMS LAKE RECREATIONAL)
WATER & SEWER DISTRICT)
_____)

**RESPONSE TO REQUEST
FOR DISCOVERY**

TO: PROTESTANTS in the above referenced matter.

COMES NOW one of the above-named Petitioner, WILLIAMS LAKE RECREATIONAL
WATER AND SEWER DISTRICT, and hereby responds to Protestants Request for Discovery as
follows:

REQUESTS

REQUEST NO. 1: Please state the name and address of each witness you intend to
call at the trial of this cause and the subject matter and facts to which each will testify.

RESPONSE TO REQUEST NO. 1:

Richard Borst, Director, Williams Lake Recreational Water and Sewer District, P.O. Box
82, Salmon, Idaho 83467, as to the need for the amendment to the water right status;

Jim Bob Infanger, Director, Williams Lake Recreational Water and Sewer District, P.O.
Box 82, Salmon, Idaho 83467, as to the need for the amendment to the water right status;

Timothy A. Murr, Director, Williams Lake Recreational Water and Sewer District, P.O.
Box 82, Salmon, Idaho 83467, as to the need for the amendment to the water right status.

REQUEST NO. 2: State the name and address, phone number, scientific technical or technical or other specialized knowledge, skill, experience, education, substance of conclusions and opinions, the underlying facts and data upon which the opinion or conclusion is based, the physical evidence (if any) analyzed, and the present custodian of any such physical evidence, and/or report prepared by any experts consulted or engaged by the Petitioner or who may be a witness in connection with this hearing.

RESPONSE TO REQUEST NO. 2:

Dave Noel, P.E., Forsgren Associates, Inc., P.O. Box 549, Rexburg, Idaho 83440, 208-356-9201, who will testify as to the findings of the Draft Williams Lake Water & Sewer Water Facilities Planning Study, Chapter 1;

Husk Crowther, Forsgren Associates, Inc., P.O. box 549, Rexburg, Idaho 83440, 208-356-9201, who will testify as to the findings of the Draft Williams Lake Water & Sewer Water Facilities Planning Study, Chapter 1;

REQUEST NO. 3: Please produce minutes of the Williams Lake Recreational Water and Sewer District from 2000 through 2006.

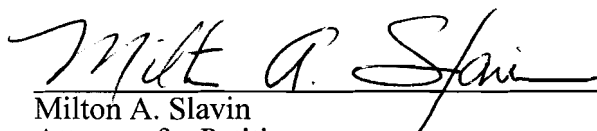
RESPONSE TO REQUEST NO. 3: Petitioners object to this request as it is irrelevant to the issues, over burdensome, and the district does not own its own office, supplies, duplicating equipment or employees to comply with this request, minutes are available to view, by appointment at Slavin Law Office.

REQUEST NO. 4: Please produce exhibits to be used at the hearing.

RESPONSE TO REQUEST NO. 4:

1. Application for Transfer from Domestic use to Municipal Use.
2. Williams Lake Recreational Water and Sewer District Water Facilities and Planning Study, Chapter 1.

DATED this 25 day of MAY 2007.


Milton A. Slavin
Attorney for Petitioners