

Randall C. Budge, ISB No. 1949
RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED
P.O. Box 1391; 201 E. Center Street
Pocatello, Idaho 83204-1391
Telephone: 208-232-6101
Fax: 208-232-6109

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF APPLICATION)	APPLICANT'S FIRST REQUESTS
FOR TRANSFER NO. 70663)	FOR PRODUCTION OF DOCUMENTS
IN THE NAME OF ANDREW POVEY)	TO INTERVENORS
_____)	

TO: ALL INTERVENORS AND THEIR ATTORNEYS OF RECORD:
A&B IRRIGATION DISTRICT AND ITS ATTORNEY ROGER D. LING
TWIN FALLS CANAL COMPANY AND NORTH SIDE CANAL COMPANY AND
THEIR ATTORNEYS, BARKER, ROSHOLT & SIMPSON LLP
BUREAU OF RECLAMATION AND ITS ATTORNEY E. GAIL McGARRY

COMES NOW Applicant, by and through counsel, pursuant to Rule 34 of the Idaho
Rules of Civil Procedure and IDAPA 37.01.01, Rule 520, and hereby requests that each
Intervenor separately respond to each of the following Requests for Production of Documents
within 15 days, in writing, signed and under oath.

REQUEST FOR PRODUCTION NO. 1: Please produce copies of all exhibits you
intend to offer in evidence at the hearing of this matter.

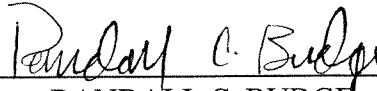
REQUEST FOR PRODUCTION NO. 2: Please produce all documents which pertain
to or on which you base your answers to Applicant's Interrogatories and Requests for Admission.

REQUEST FOR PRODUCTION NO. 3: Please produce each and every document that
proves or tends to support your claim that your water rights will be injured by approval of the

transfer proposed by Applicant.

DATED this 3rd day of June, 2004.

RACINE, OLSON, NYE, BUDGE & BAILEY,
CHARTERED

By 
RANDALL C. BUDGE
Attorney for Applicant

CERTIFICATE OF MAILING

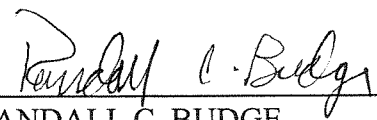
I HEREBY CERTIFY that on this 3rd day of June, 2004, I mailed a true and complete copy of the foregoing document, postage prepaid, to each of the following:

Twin Falls Canal Company
North Side Canal Company
c/o Barker Rosholt & Simpson LLP
P.O. Box 2139
Boise, Idaho 83701-2139

A&B Irrigation District
c/o Roger Ling
P.O. Box 396
Rupert, Idaho 83350

U.S. Department of Interior
Bureau of Reclamation
Attn: E. Gail McGarry
1150 N. Curtis Road, Ste 100
Boise, ID 83706-1234

Ronald D. Carlson
Regional Manager
Idaho Department of Water Resources
900 N. Skyline Drive
Idaho Falls, Idaho 83402


RANDALL C. BUDGE