



State of Idaho

DEPARTMENT OF WATER RESOURCES

322 East Front Street • P.O. Box 83720 • Boise, Idaho 83720-0098

Phone: (208) 287-4800 • Fax: (208) 287-6700 • Website: www.idwr.idaho.gov

C.L. "BUTCH" OTTER
Governor

GARY SPACKMAN
Director

May 2, 2016

Re: Preliminary Order Suspending Rotation Credit – Water District 34, Big Lost River

Dear Water Right Holder,

Enclosed please find a copy of a Preliminary Order suspending rotation credit in Water District 34, Big Lost River issued by the Deputy Director of the Idaho Department of Water Resources ("Department"). This order suspends the practice of rotation credit in Water District 34 for the 2016 irrigation season and indefinitely thereafter. Rotation credit is the practice in which water rights from the Big Lost River below Mackay Reservoir are stored in Mackay Reservoir for credit.

Please note that, as stated in the Preliminary Order, the Department may consider approving the practice of rotation credit in any subsequent year if the Big Lost River Irrigation District annually consents to the practice in writing and develops a plan of operation for rotation credit that improves the efficiency of water use.

Please contact this office or the Department's regional office in Idaho Falls (208-525-7161) if you have any questions concerning the attached order.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Luke".

Tim Luke
Water Compliance Bureau

Encl: *Preliminary Order in the Matter of Rotation Credit in Water District 34, Big Lost River Basin*

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

IN THE MATTER OF ROTATION)
CREDIT IN WATER DISTRICT 34,)
BIG LOST RIVER BASIN)
_____)

**PRELIMINARY ORDER
SUSPENDING ROTATION
CREDIT IN WATER DISTRICT 34**

The Director (“Director”) of the Idaho Department of Water Resources (“Department”) has direction and control of the distribution of water from all natural water sources within water districts and has adopted rules and regulations for the distribution of water within Water District 34 (“WD 34”) in accordance with chapter 6, Title 42, Idaho Code. The Department, having reviewed the practice of rotation credit¹ in WD 34 with respect to delivery of surface water on the Big Lost River below Mackay Reservoir, finds, concludes, and orders as follows.

FINDINGS OF FACT

1. Only a few ground water wells were present in the Big Lost River Valley prior to 1960. Johnson, G.S., Ralston, D.R., Mink, L.L, *Ground Water Pumping Impacts on Surface Water Irrigation Diversions from Big Lost River at 18*, Idaho Water Resources Research Institute, University of Idaho, Moscow, Idaho, at 18 (1991). Ground water development in the Big Lost River basin grew rapidly in the early 1960’s and again in the early to middle 1970’s. *Id.*

2. Rule 50.04.c. of the Department’s WD 34 Rules states that depletion to the Big Lost River from ground water pumping is estimated to be 13% of average annual pumping and that average annual pumping is estimated at 47,000 acre-feet (“AF”) per year, or a depletion of 6,110 AF per year. IDAPA 37.03.12.050.04(c). The average annual use was estimated by the University of Idaho for the period of 1984 through 1990. Johnson, G.S., Ralston, D.R., Mink, L.L, *Ground Water Pumping Impacts on Surface Water Irrigation Diversions from Big Lost River at 18*, Idaho Water Resources Research Institute, University of Idaho, Moscow, Idaho, at 35-38 (1991).

3. Average annual ground water pumping in WD 34 for 2014 and 2015 was about 102,000 acre-feet.²

4. Starting in 2014 the Department undertook efforts to modernize, update, and augment the computerized accounting programs and practices in WD 34. The Department’s recent water right accounting efforts have led to a detailed review of the computerized

¹ Rule 10.12 of the Department’s WD 34 Rules defines “Rotation Credit” as “water impounded in Mackay Reservoir pursuant to a water right whose source of water is the Big Lost River and which does not include storage as a purpose of use.” IDAPA 37.03.12.010.12.

² Pumping in these years is based on WD 34 data from installed flow meters available in 2014-2015 Watermaster’s Reports.

accounting program code and procedures, WD34 records, Big Lost River Irrigation District records, WD 34 Rules, and the practice of rotation of natural flow water rights into storage.

5. Starting in December 2015, the Department participated in a series of discussions with WD 34 water users and Idaho legislators to address mounting concerns regarding the sufficiency of the water supply in Basin 34.

6. Average annual pumping in WD 34 from 1990 to 2015 more than doubled from 47,000 AF to 102,000 AF. Consequently, river depletions from ground water pumping have at least doubled during the same period. As a result, there is less surface water available in the river for diversion by Big Lost River priority rights.

7. With respect to the practice of rotation credit, General Provision 3 from the *Amended Partial Decree for General Provisions in Administrative Basin 34* states, in pertinent part:

Water rights from the Big Lost River diverted below Mackay Dam and Reservoir may be rotated into storage with the consent of the Big Lost River Irrigation District when such practice improves the efficiency of water use. Such rotation is subject to the following conditions and review and approval by the Director of the [Department].

Final Unified Decree, In re SRBA, Case No. 39576 (Fifth Jud. Dist. Ct. Aug 26, 2014) at Attachment 3.

8. Rule 40.02 of the WD 34 Rules also describes the practice of rotation credit, stating, in pertinent part:

02. Water rights that do not include storage as a purpose of use may not be stored. Water rights whose source is Big Lost River with their point of diversion below the Mackay Dam may, however, be rotated for credit when such practice improves the efficiency of water use as contemplated by the Big Lost River Irrigation District's plan of operation subject to the following conditions:

- a. Rotation for credit must be approved by the director as provided by these rules.
- b. Rotation for credit must be pursuant to the Big Lost River Irrigation District's approved plan of operation.

IDAPA 37.03.12.040.02(a-b).

9. To be consistent with General Provision 3 and the WD 34 Rules, therefore, the practice of rotation credit in WD 34 must "be pursuant to the Big Lost River Irrigation District's approved plan of operation," improve "the efficiency of water use," and be "approved by the Director."

10. The Big Lost River Irrigation District's original plan of operation was adopted by the District's Board of Directors on April 1, 1935.³ This plan of operation includes just two references to "rotation" as follows:

It is planned that by this District having the property in and control of the above amount of water, which will be used to furnish a supplemental water supply to lands in the District and now having an insufficient water supply, and the employment of a rotation system of water for irrigation purposes, and the storage of natural flow rights, privately owned, at different times in the said Mackay Dam, the District will be enabled to save and conserve large amounts of water and make a successful project out of one that has heretofore been short of water.

...

The use and control, under proper management, of the reservoir, the dam and the other construction works referred to elsewhere, will make possible the operation of an efficient system of rotation among the users themselves, and thereby further increasing the duty of water and conserving the same.

Minutes of the Adjourned Regular Meeting of Board of Directors of the Big Lost Irrigation District, Butte and Custer Counties, Idaho, April 1, 1935, adopting the Proposed Plan of Operations, Big Lost River Irrigation District, J. Ray Weber, March 30, 1935, Exhibit A, p. 2, 8.

11. The 1935 plan of operations was developed in connection with the Big Lost River Irrigation District's loan application to purchase the Mackay Dam and water rights from the Utah Construction Company, as well as the Company's Carey Act project near Arco. *Id.* at 2-6. The purchase allowed the irrigation district to use the storage water from Mackay Reservoir to supplement lands in the district irrigated with private natural flow rights from the Big Lost River.

12. The Big Lost River Irrigation District's current *Operation Plan for Mackay Dam and Reservoir, 2002*, includes no information about the practice of rotation credit.⁴

³ Available at the Department's WD 34 webpage at: <http://www.idwr.idaho.gov/water-rights/water-districts/active.html>.

⁴ Available at the Department's WD 34 webpage at: <http://www.idwr.idaho.gov/water-rights/water-districts/active.html>.

13. The Big Lost River Irrigation District has reported in recent years that a significant amount of water from Big Lost River natural flow water rights annually rotated to and stored in the Mackay Reservoir remains unused in the reservoir at the end of the year. The irrigation district office reported to the Department the amount of rotation credit remaining in storage at the end of the irrigation season (October 15th) for the following years:

<u>Year</u>	<u>Unused Rotation Credit (AF)</u>
2010	2,668
2011	6,886
2012	14,640
2013	2,308
2014	3,007
2015	2,355

14. The volume content of the Mackay Reservoir at the end of the 2012 irrigation season was 15,600 AF.⁵ According to Big Lost River Irrigation District records,⁶ the unused rotation credit at the end of the 2012 irrigation season was 14,640 AF. Therefore, the 2012 volume of unused rotation credit was 94% of the total reservoir contents at the end of the 2012 irrigation season.

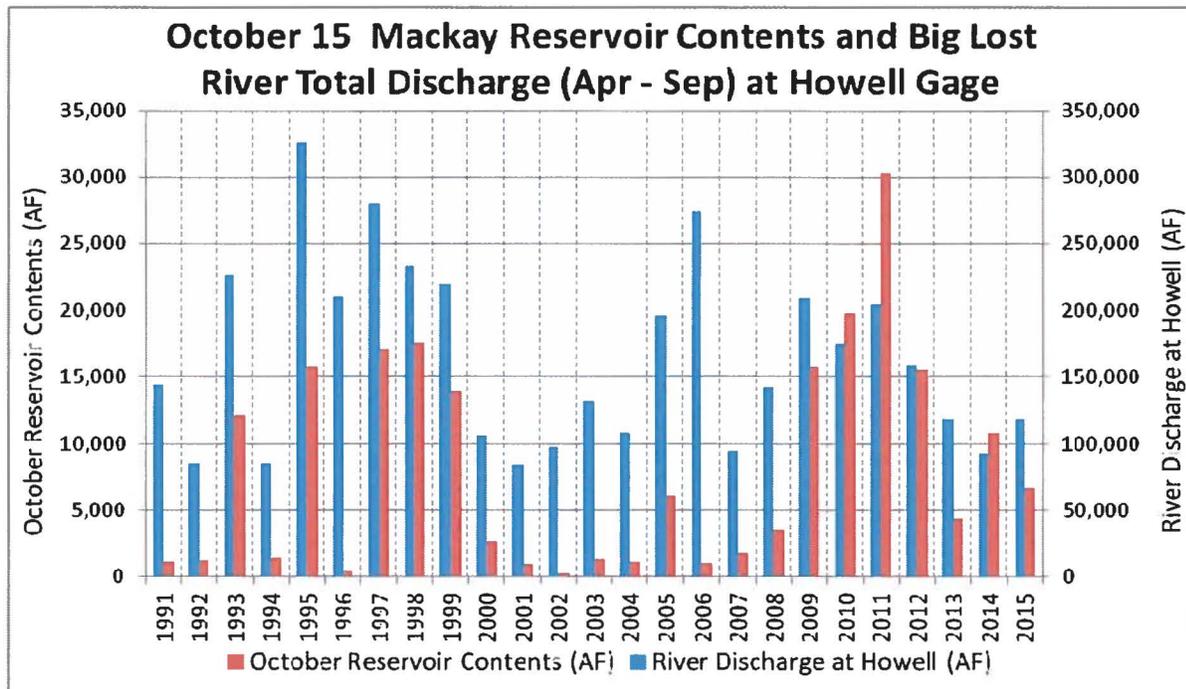
15. Big Lost River Irrigation District records from 2015 show that a total of 4,115 AF of water was rotated to the reservoir during the irrigation season of which 2,355 AF, approximately 57%, remained unused in the reservoir at the end of the irrigation season.

16. Keeping rotation credit in storage through the end of the irrigation season depletes the natural flow of the Big Lost River below Mackay Reservoir, thereby reducing the amount of water available for appropriation by other water users during the irrigation season. For example, leaving 3,000 AF of unused rotation credit in the reservoir, as occurred in 2014, equates to a flow rate of approximately 50 cubic feet per second (“CFS”) diverted for one month that could have been added to the Big Lost River during the irrigation season. This flow and corresponding volume is enough water to irrigate an additional 858 acres per year assuming a field head gate delivery of 3.5 acre-feet per acre and no conveyance losses. Even at 50% conveyance loss, the unused rotation credit is enough water to irrigate an additional 428 acres.

⁵ Data obtained from the United States Geologic Survey for the 13126000 Mackay Reservoir Nr Mackay gaging station.

⁶ Big Lost River Irrigation District water management records are available on the Department’s webpage at: <http://www.idwr.idaho.gov/water-rights/water-districts/active.html>.

17. Data for Mackay Reservoir contents and Big Lost River flow above the reservoir demonstrate a trend of increasing reservoir carryover in recent years. The graph below compares reservoir contents at the end of the irrigation season (October 15) with total irrigation season flow (April through September) in the Big Lost River as measured at the Howell gage station.⁷ Note that end of season reservoir contents over the past seven years are proportionately greater to annual Big Lost River irrigation season flows than the period 1991 through 2008.⁸ The level of carryover in the last seven years has increased during lower runoff years or drier irrigation seasons as compared to the years 1991 to 2008. The increased carryover is due in part to an increase in unused rotation credit.



18. Upon review of the Big Lost River Irrigation District’s 2015 end of year storage and rotation credit balances for individual accounts, the Department observed the following:

- a. Some water user accounts had positive rotation credit balances at the end of the irrigation season but no water use (storage water or natural flow water rights) during the irrigation season. The water rotated to the reservoir was not used, nor was it available to any other water user.
 - i. For example, one user on the Munsey Ditch had a positive rotation credit balance of 1,900 inches (75.4 AF) and a storage balance of 3,790 inches (150 AF) but had no canal heading delivery of either natural flow water rights or storage water during the irrigation season.

⁷ River discharge data obtained from the United States Geologic Survey for the 13120500 Big Lost River at Howell Ranch Nr Chilly ID gaging station.

⁸ Mackay Reservoir was purposefully drained in 1996 and 2006 to allow for the repair and maintenance of the dam and primary outlet works.

- b. Some water user accounts had positive rotation credit balances at the end of the irrigation season despite receiving a full delivery of natural flow water in an amount sufficient to meet their total irrigation needs for the season. In such instances, water users rotating natural flow into storage that is not subsequently used during the irrigation season deprive other water users with Big Lost River priority rights from receiving the natural flow water.
 - i. For example, one user on the Beck Ditch had a positive rotation credit balance at the end of the irrigation season of 4,524 inches (180 AF) and no delivery of storage water to either the canal heading or the field head gate. The user has multiple irrigation rights from the Big Lost River, including one senior water right bearing a priority date of April 2, 1884 authorizing diversion of 1.64 CFS and irrigation of a total of 193 acres. The 1884 right was deliverable all season to the Beck Ditch heading according to WD 34 records. The user has no supplemental ground water rights. Review of 2015 aerial imagery shows the user irrigated about 75 acres. The user received a total seasonal field head gate delivery of 5700 inches (226 AF), all from natural flow water rights. Because the user was legally able to divert up to 696 AF of water (1.64 CFS diverted continuously for the entire irrigation season) under the 1884 water right, but only diverted 226 AF, the user received an adequate supply. The 180 AF of rotated water could have been used instead to irrigate additional land authorized by the 1884 priority water right, or if no such need existed, could have been available to satisfy other Big Lost River priority rights.

19. Rotating natural flow water rights from the Big Lost River to the reservoir during the irrigation season diminishes the available flow of water in the river below the reservoir to fill natural flow priority water rights. Review of Big Lost River Irrigation District daily delivery records (ditch rider logs) for July, 2015, shows that Big Lost River natural flow water rights were rotated to the reservoir at an average rate of 10 CFS per day, while deliveries below the reservoir were regulated or limited to water rights with priority dates of May 31, 1884. An additional daily flow of 10 CFS in the river during July could have been used to minimize river conveyance losses or deliver some portion of the next available priority water rights bearing a priority date of June 1, 1884.

CONCLUSIONS OF LAW

1. The effects on the Big Lost River from the doubling of average annual ground water pumping in WD 34 from 1990 to 2015, in addition to recent actions of the Department to update computerized accounting for WD 34, and mounting concerns in WD 34 regarding the sufficiency of the water supply in Basin 34, have led to a Department review of the rotation credit practices in WD 34.

2. The Big Lost River Irrigation District's current *Operation Plan for Mackay Dam and Reservoir* contains no information about the practice of rotation credit. The irrigation district's 1935 plan of operations includes just two references to the concept of "rotation," but lacks specific explanation, criteria, or standards with respect to implementation of the practice of rotation credit. The Big Lost River Irrigation District has no current documentation that

describes or explains the practice of rotation credit in WD 34. Thus, it is impossible for the Department to determine whether the practice of rotation credit in WD 34 is occurring “pursuant to the Big Lost River Irrigation District’s approved plan of operation” in compliance with the WD 34 Rules.

3. The current practice of rotation credit in WD 34, which results in increased river depletions and leaves more than 50% of rotated water unused in the reservoir at the end of the irrigation season, does not “improve the efficiency of water use” as required by General Provision 3 and Rule 40.02 of the WD 34 Rules. The common practice of leaving natural flow water unused in the reservoir at the end of the irrigation season prevents the use of natural flow water by other Big Lost River priority rights, which compromises the efficient use of the total water supply and is contrary to the optimal utilization of the resource.

4. Findings of Fact 18.a.i. and 18.b.i. of this order exemplify that current natural flow rotation practices in WD 34 do not “improve the efficiency of water use” as required by General Provision 3 and Rule 40.02 of the WD 34 Rules. Instead, such practices have resulted in water user accounts having positive rotation credit balances at the end of the irrigation season and no water use (storage water or natural flow water rights) during the irrigation season. Under such circumstances, the water rotated to the reservoir is not used and is not available to other Big Lost River priority rights, which degrades the overall efficiency of water use. Current natural flow rotation practices have also resulted in water user accounts having positive rotation credit balances at the end of the irrigation season despite receiving full delivery of natural flow water in an amount sufficient to meet their total irrigation needs for the season. Under such circumstances, the water users rotating natural flow unnecessarily prevent the use of natural flow water by other Big Lost River priority rights, which degrades the overall efficiency of water use.

5. Because it is impossible for the Department to determine whether the practice of rotation credit in WD 34 is occurring “pursuant to the Big Lost River Irrigation District’s approved plan of operation” in compliance with the WD 34 Rules and the current practice of rotation credit does not “improve the efficiency of water use” as required by General Provision 3 and Rule 40.02 of the WD 34 Rules, the practice of rotation credit should be suspended for the 2016 irrigation season and indefinitely thereafter.

ORDER

IT IS THEREFORE HEREBY ORDERED as follows:

1. The practice of rotation credit in WD 34 is hereby SUSPENDED for the 2016 irrigation season and indefinitely thereafter.
2. The Department may consider approving the practice of rotation credit in any subsequent year if the Big Lost River Irrigation District annually consents to the practice in writing and develops a plan of operation for rotation credit that improves the efficiency of water use.

Dated this 29th day of April 2016.



MAT WEAVER
Deputy Director

EXPLANATORY INFORMATION TO ACCOMPANY A PRELIMINARY ORDER

(To be used in connection with actions when a hearing was **not** held)

(Required by Rule of Procedure 730.02)

The accompanying order or approved document is a "**Preliminary Order**" issued by the department pursuant to section 67-5243, Idaho Code. **It can and will become a final order without further action of the Department of Water Resources ("department") unless a party petitions for reconsideration, files an exception and brief, or requests a hearing as further described below:**

PETITION FOR RECONSIDERATION

Any party may file a petition for reconsideration of a preliminary order with the department within fourteen (14) days of the service date of this order. **Note: the petition must be received by the department within this fourteen (14) day period.** The department will act on a petition for reconsideration within twenty-one (21) days of its receipt, or the petition will be considered denied by operation of law. See Section 67-5243(3) Idaho Code.

EXCEPTIONS AND BRIEFS

Within fourteen (14) days after: (a) the service date of a preliminary order, (b) the service date of a denial of a petition for reconsideration from this preliminary order, or (c) the failure within twenty-one (21) days to grant or deny a petition for reconsideration from this preliminary order, any party may in writing support or take exceptions to any part of a preliminary order and may file briefs in support of the party's position on any issue in the proceeding with the Director. Otherwise, this preliminary order will become a final order of the agency.

REQUEST FOR HEARING

Unless a right to a hearing before the Department or the Water Resource Board is otherwise provided by statute, any person aggrieved by any final decision, determination, order or action of the Director of the Department and who has not previously been afforded an opportunity for a hearing on the matter may request a hearing pursuant to section 42-1701A(3), Idaho Code. A written petition contesting the action of the Director and requesting a hearing shall be filed within fifteen (15) days after receipt of the denial or conditional approval.

ORAL ARGUMENT

If the Director grants a petition to review the preliminary order, the Director shall allow all parties an opportunity to file briefs in support of or taking exceptions to the preliminary order and may schedule oral argument in the matter before issuing a final order. If oral arguments are to be heard, the Director will within a reasonable time period notify each party of the place, date and hour for the argument of the case. Unless the Director orders otherwise, all oral arguments will be heard in Boise, Idaho.

CERTIFICATE OF SERVICE

All exceptions, briefs, requests for oral argument and any other matters filed with the Director in connection with the preliminary order shall be served on all other parties to the proceedings in accordance with IDAPA Rules 37.01.01302 and 37.01.01303 (Rules of Procedure 302 and 303).

FINAL ORDER

The Director will issue a final order within fifty-six (56) days of receipt of the written briefs, oral argument or response to briefs, whichever is later, unless waived by the parties or for good cause shown. The Director may remand the matter for further evidentiary hearings if further factual development of the record is necessary before issuing a final order. The department will serve a copy of the final order on all parties of record.

Section 67-5246(5), Idaho Code, provides as follows:

Unless a different date is stated in a final order, the order is effective fourteen (14) days after its service date if a party has not filed a petition for reconsideration. If a party has filed a petition for reconsideration with the agency head, the final order becomes effective when:

- (a) The petition for reconsideration is disposed of; or
- (b) The petition is deemed denied because the agency head did not dispose of the petition within twenty-one (21) days.

APPEAL OF FINAL ORDER TO DISTRICT COURT

Pursuant to sections 67-5270 and 67-5272, Idaho Code, if this preliminary order becomes final, any party aggrieved by the final order or orders previously issued in this case may appeal the final order and all previously issued orders in this case to district court by filing a petition in the district court of the county in which:

- i. A hearing was held,
- ii. The final agency action was taken,
- iii. The party seeking review of the order resides, or
- iv. The real property or personal property that was the subject of the agency action is located.

The appeal must be filed within twenty-eight (28) days of this preliminary order becoming final. See section 67-5273, Idaho Code. The filing of an appeal to district court does not itself stay the effectiveness or enforcement of the order under appeal.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of May 2016, the above and foregoing document was served on each individual or entity on the service list for this matter on file at the Idaho Department of Water Resources, 322 East Front Street, Boise, Idaho and www.idwr.idaho.gov. Each individual or entity on the service list was served by placing a copy of the above and foregoing document in the United States mail, postage prepaid and properly addressed.

Documents served: **Preliminary Order Suspending Rotation Credit for Water District 34**



Sarah Shaul
Technical Records Specialist
Idaho Department of Water Resources

DIANA L ADAMS
3044 N 3350 W
MOORE ID 83255

BRADFORD AESCHLEMAN
415 HIDDEN TRAIL LN
TWIN FALLS ID 83301

GERALDINE AHRENDT
PO BOX 418
ARCO ID 83213

ERIC AND JANET AIKELE
PO BOX 10
ARCO ID 83213

DON A AIKELE
3480 W 2700 N
MOORE ID 83255

ROGER LEE ALLEN
PO BOX 652
MOORE ID 83255

DEAN AND KARALEE W ANDERSEN
3450 W 2900 N
MOORE ID 83255

MAURICE H ANDERSON
PO BOX 131
ARCO ID 83213

JUDITH D AND MARLIN D ANDERSON
4334 HOUSTON RD
MACKAY ID 83251

BARBARA AND TREVOR ANDERSON
2780 N 3375 W
MOORE ID 83255

BRIAN M ANDERSON
PO BOX 308
ARCO ID 83213

TAMI AND TOM ARCHER
PO BOX 821
ARCO ID 83213

MARJORIE J BABCOCK
PO BOX 14
MOORE ID 83255

ARLENE BAILEY AND DARLENE HIGGINS
412 HIGHLAND BLVD
BRIGHAM CITY UT 84302

TIMOTHY BARNES
2069 ROSS AVE
AMMON ID 83406

DAVID AND SHERRY BARNHARD
PO BOX 244
MACKAY ID 83251

BIG LOST RIVER SUBDIVISION HOMEOWNERS ASSN
C/O KIT CHRISTENSEN AND/OR DELL HARNEY
3427 W 3700 N
MOORE ID 83255

CHERYL J AND MAX J BINGHAM
3861 N HWY 93
LESLIE ID 83255

BRUCE E BLACKMER
3264 W 2900 N
MOORE ID 83255

BRUCE AND CARMA BLEAK
3350 W 3000 N
MOORE ID 83255

BILLY J AND MARY LOU BOGART
2749 N 3375 W
MOORE ID 83255

AMY AND CARSON BOGART
2741 N 3375 W
MOORE ID 83255

RAY MILTON AND RUBY JOYCE BOYACK
3085 KING MOUNTAIN RD
MOORE ID 83255

CANDY LEE AND JOHNATHAN KENNETH BRAGG
3449 W 2700 N
MOORE ID 83255

DENNIS L BRASWELL
2131 N 2900 W
ARCO ID 83213

TRUDY I BRASWELL
RT 1 BOX 215
ARCO ID 83213

JOE AND TERRI BRONSON
2422 CANNON RD
ARCO ID 83213

JEROME P AND NAN L BURCH
2763 VISTA BUENA
FAIRFIELD CA 94533

KIM BURWELL
4249 US HWY 93
MACKAY ID 83251

BUTTE COUNTY
PO BOX 737
ARCO ID 83213

ANTHONY CAIN AND FREDERICK W HUFFMAN
4126 N 4100 W
MACKAY ID 83251

CAROLE L AND JIMMIE L CAMPBELL
2181 N 2900 W
ARCO ID 83213

CRYSTAL A AND NATHAN D CARPENTER
PO BOX 307
ARCO ID 83213

HEATHER I AND VAL C CARTER
1025 S 1500 W
PINGREE ID 83262

ALTHEA I CHANDLER
4-000 N 3500 W
DARLINGTON ID 83255-9604

CITY OF MACKAY
PO BOX 509
MACKAY ID 83251

PATRICIA J CLARY
PO BOX 385
ARCO ID 83213

JODY K AND MARTY T COBURN
PO BOX 435
MOORE ID 83255

RICHARD L AND YVONNE S COLE
3685 US HWY 93 N
MOORE ID 83255

CRAIG AND LERRINA COLLINS
3104 N 3400 W
MOORE ID 83255

CORP OF THE PRESIDING BISHOP
CHURCH OF JESUS CHRIST OF LATTER DAY SAINTS
REAL ESTATE SERVICES DIV
50 E NORTH TEMPLE ST
SALT LAKE CITY UT 84150-6320

HARRY J CRAWFORD
RT 1 BOX 8
DARLINGTON ID 83231

FRANCIS M AND LINDA J DALLEY
2389 HWY 20
PO BOX 14
ARCO ID 83213

RANDAL G AND SANDRA L DAMIANA
PO BOX 570
MACKAY ID 83251

ANDREW J AND WANETA M DICKERSON
3436 N 3350 W
MOORE ID 83255

JOHN ANTHONY DONOVAN
PO BOX 676
MOORE ID 83255

CAROLE A AND GENE I ERDMAN
15530 COUNTY RD 80
LIVERMORE CO 80536

CARL AND LANELL FARMER
PO BOX 432
ARCO ID 83213

FELTON FARMS LLC
PO BOX 1674
KETCHUM ID 83340

R M FLORY
RT 1 BOX 96-A
MOORE ID 83255

HEATHER HORTON FLYNN
PO BOX 72
HAILEY ID 83333

GLORIA PRITCHETT AND MARVIN D FOSTER
PO BOX 424
MACKAY ID 83251

LOWELL FRAUENHOLZ
PO BOX 269
MACKAY ID 83251

RICHARD T FREEMAN
3238 W 2600 N
ARCO ID 83213

ALBERT W FULLMER JR AND ELEANOR FULLMER
3960 N 3650 W
MOORE ID 83255

JOSHUA B J FELTON GABIOLA
4058 N 4080 W
MACKAY ID 83251

BRETT AND MINDY GAMETT
3219 N US HWY 93
MOORE ID 83255

RANDY GAMETT
PO BOX 622
MOORE ID 83255

GEORGE A AND VERA JEAN GILBERT
3279 W 3300 N
MOORE ID 83255-8724

CINDY LOU AND JAMES S GREGORY
5306 ZOLLINGER RD
MACKAY ID 83251

MARY AND RICK GRIFFITH
3354 W 3500 N
MOORE ID 83255

FERN B AND GLENN T GUTHRIE
3328 W 3120 N
MOORE ID 83255

DESSA ROBIN AND MAURICE DUANE HANEY
3457 N 3350 W
MOORE ID 83255-8763

MARC T HANSEN
HC 65 BOX 1079
HOWE ID 83244

TEENA HANSEN
2700 N 3520 W
MOORE ID 83255

KIMBERLY A AND RICHARD C HARRY
3451 W 3400 N
MOORE ID 83255

JACQUELINE L AND KENTON L HARWOOD
PO BOX 463
MOORE ID 83255

DOROTHY HARWOOD
PO BOX 135
ARCO ID 83213

JOANN R AND ROBERT J HAUCK
4312 N US HWY 93
MACKAY ID 83251

GREG AND JULIE HAYWARD
PO BOX 701
ARCO ID 83213

BRIDGET L AND OTTO J HIGBEE
3943 W 4200 N
MOORE ID 83255

DIANNE HILL-PARKER
PO BOX 397
MACKAY ID 83251

DARLA ANN AND MELVIN MARX HINTZE
RT 1 BOX 14
MACKAY ID 83251

S K HINTZE
RT 1
MACKAY ID 83251

DOUG HOLBROOK
PO BOX 268
MACKAY ID 83251

HOUSTON GRAZING ASSN
C/O LLOYD SMITH
RT 1 BOX 18
MACKAY ID 83251

BARBARA AND LONE JAMES HUELSMAN
3304 NORTH 3400 WEST
MOORE ID 83255

DALE MARIE HUNT
PO BOX 336
MACKAY ID 83251

JAM EXPLORATION LLC
PO BOX 8890
KETCHUM ID 83340

DE ANN N AND JAY V JENSEN
3165 W 3300 N
MOORE ID 83255-8724

PAM JENSEN
PO BOX 321
ARCO ID 83213

HOLGER P JENSEN
PO BOX 323
MACKAY ID 83251

DIANA AND JACK A JENSEN AND PEGGY AND RANDY D
PEHRSON
3328 W 2900 N
MOORE ID 83255

DARLENE B AND L VAUGHN JENSEN
3347 W 2900 N
MOORE ID 83255

LARRY JENSEN
3243 N KING MTN RD
MOORE ID 83255

MARY KEITH JOHNSON
2654 N 25TH E
IDAHO FALLS ID 83401

PHYLLIS J JONES
RT 1 BOX 91-B
MOORE ID 83255

JAMES RYAN AND SUSAN L JONES
RT 1
DARLINGTON ID 83231

AGNES M AND ROLLAND D JONES
PO BOX 33
ARCO ID 83213

ARLIE AND VICKI KEISTER
3264 N 3350 W
MOORE ID 83255

JEANNE AND STEVE F KELLER
PO BOX 113C
3232 W 3400TH N
MOORE ID 83255

GARY L AND LINDA L KIMBALL
PO BOX 273
MACKAY ID 83251

LORI B AND STEPHEN K KING
3261 N 3250 W
MOORE ID 83255-8729

DONNIE AND PATTY KRUSE
PO BOX 138
ARCO ID 83213

CHRISTOPHER AND LIANNE KUBS
3075 W 2500 N
ARCO ID 83213

JOHN AND LARUE LAMBERT
4096 N 4300 W
PO BOX 545
MACKAY ID 83251

MARIANNE AND PAUL LANIER
3820 W 4400 N
MACKAY ID 83251

LAST RANCH LLC
PO BOX 199
JEROME ID 83338

JOSEPH AND JULIE LEWIS
3342 W 3175 N
MOORE ID 83255

HELEN AND LLOYD MAESTAS
RT 1 BOX 388
ARCO ID 83213

MAGEE FAMILY TRUST
PO BOX 55
MACKAY ID 83251

JACK L MC AFFEE
C/O STERLING MC AFFEE
RT 1
MOORE ID 83255

GAIL AND SCOTT L MC AFFEE
PO BOX 282
MACKAY ID 83251

GWENDOLYN AND JAMES MC ALISTER
PO BOX 54
MACKAY ID 83251

VALERIE MC COY
RT 1 BOX 189
ARCO ID 83213

JAMES AND JESSICA MC DONALD
8 N 3900 E
RIGBY ID 83442

NANCY M MC DONALD
PO BOX 102
ARCO ID 83213

DAN MC INTOSH
4100 W 4107 N
MACKAY ID 83251

WILLIAM J MC KNIGHT
PO BOX 93
MACKAY ID 83251-0093

GREG J MITCHELL
4306 HOUSTON RD
MACKAY ID 83251

KAREN M AND TERRY V MONSON
RT 1 BOX 30
DARLINGTON ID 83231

MOORE WATER USERS ASSN
PO BOX 462
MOORE ID 83255

JOHN AND LINDA MORGAN
RT 1 BOX 219
ARCO ID 83213

CHERYL D MORT
2723 BRIAR DR
HOMEDALE ID 83628

DENNIS K MOSS AND MOSS FARMS INC
3286 N 3350 W
MOORE ID 83255

A ETSSEL AND CLEA T MOSS
3286 N 3350 W
MOORE ID 83255-8761

MARY MOZES
3320 W 3400 N
MOORE ID 83255

DUANE AND LEAH NATION
RT 1 BOX 114
MOORE ID 83255

G DAVID AND HEATHER M NELSON AND NELSON MACKAY
RANCH LLC
PO BOX 360
MACKAY ID 83251

CONNIE AND KIP NELSON
PO BOX 641
MOORE ID 83255

PEGGY AND REX NELSON
2842 W LASTRADA CIR
SALT LAKE CITY UT 84065

NOLAN SAYER FARMING & RANCHING
PO BOX 213
MACKAY ID 83251

NORMAN & MARY SOWARDS LIVING TRUST
3186 WEST 3000 NORTH
MOORE ID 83255

NORTH 40 PARTNERS LC
PO BOX 9
BELFRY MT 59008

BRIAN AND NIKOLE OKELLEY
4036 N 3600 W
MOORE ID 83256

JAY F AND SUSAN PEARSON
2830 N 3375 W
MOORE ID 83255

CHERI AND KEVIN PEARSON
3277 W 3400 N
MOORE ID 83255

LOY PEHRSON
3700 N 3624 W
DARLINGTON ID 83255

PEGGY AND RANDY D PEHRSON
3754 W 4050 N
MOORE ID 83255

JOSH, MICHELLE AND TRAVIS PEHRSON
PO BOX 32
MACKAY ID 83251

BYRON, LANA AND TERRI PEHRSON
3624 W 3700 N
DARLINGTON ID 83255

MARSHAL TODD AND NORMA PERKES
2790 N 3325 W
MOORE ID 83255

THOMAS J PERKES
2779 N 3375 W
MOORE ID 83255

AUSTIN AND MARIE PLATT
3330 W 3400 N
MOORE ID 83255

JOHN, JOHN L AND PATRICK POWERS
PO BOX 493
MACKAY ID 83251

E BLAINE AND JO ANN PRICE
RT 1 BOX 295
ARCO ID 83213

STEVE L AND TERRI L PRITCHETT
5395 OLD CHILLY RD
MACKAY ID 83251

LARRY A QUIST
2272 N 2900 W
ARCO ID 83213

RICKIE REED
210 PARK RD
ARCO ID 83213

REVA W WALKER TRUST
PO BOX 32
ARCO ID 83213

JACQUELINE AND RICHARD REYNOLDS
3253 W 2800 N
ARCO ID 83213

JANET E AND K W RICHARDSON
58 N 3167 E BEAR ISLAND DR
IDAHO FALLS ID 83402

RIVER PARK GOLF COURSE & CAMPGROUND LLC
PO BOX 119
MACKAY ID 83251

MARK ROBERTS
3101 W 2500 N
ARCO ID 83213

FRANK AND SUSAN ROSA
355 N 7TH
POCATELLO ID 83201

LESTER K AND LOWAYNE K ROSENKRANCE
1132 E MASTIFF ST
MERIDIAN ID 83642-7447

BYRON M SAYER
RT 1 BOX 1025
LESLIE ID 83249

BIRGITTA AND ROGER SAYER
4644 S LOCUST LN
SALT LAKE CITY UT 84117

BILL AND JILL SCHMIDT
4515 HWY 93
MACKAY ID 83251

PHILLIP D SCOTT
7244 W PORTNEUF RD
POCATELLO ID 83201

JIM L AND LINDA SCOUTEN
PO BOX 623
MOORE ID 83255

OLIVIA AND WILLIAM SCOUTEN
PO BOX 653
MOORE ID 83255

HEATHER CAMILLE SHOSTED
PO BOX 667
MOORE ID 83255

DEAN AND GAYLE SIDDOWAY
3312 W 3400 N
MOORE ID 83255-8730

SILCOCK PROPERTIES
515 E 300 S
BURLEY ID 83318

PATRICA SLAYTON
3326 W 3400 N
MOORE ID 83255-8730

SHARON AND TED E SLUDER
410 PARK RD
ARCO ID 83213

LESLIE AND SANDRA SMITH
1918 N 725 W
WEST BOUNTIFUL UT 84087

KATRIINA SMITH
3034 N 3350 W
MOORE ID 83255

PHYLLIS JEAN AND TERRY LYNN SMITH
3403 N HWY 93
MOORE ID 83255

DALE E SMITH
3076 N 3350 W
MOORE ID 83255-9794

JENNIE M AND ORVILLE E SMITH
RT 1 BOX 52
DARLINGTON ID 83231

JENNIE MARIE AND ORVILLE E SMITH
3897 W 3700 N
MOORE ID 83255

RONALD SCOTT AND TEKLA A STALEY
1443 W 3700 N
HOWE ID 83244

ANDREW G AND E ELAINE STAV
3306 W 3400 N
MOORE ID 83255

JUNE STEVENSON
3473 W 3450 N
MOORE ID 83255

G CRAIG AND JACKIE STEWART
3405 W 2700 N
MOORE ID 83255

DOROTHY B AND WILLIAM A STEWART
PO BOX 408
ARCO ID 83213

ANDRE KINDALL, CAROL J AND JASON KINDALL STROPE
3800 HILL RD
BOISE ID 83703

SUNSET TRUST ORGANIZATION
C/O ARTHUR W QUIST MGR
2272 N 2900 W
ARCO ID 83213

DEBORAH A AND ERNEST TATE
PO BOX 305
ARCO ID 83213

VIVA TAYLOR
PO BOX 275
MACKAY ID 83251

MARK AND PAIGE TELFORD
PO BOX 511
ARCO ID 83213

BARBARA V THORNTON
2245 N 2900 W
ARCO ID 83213

ROBERT M THORNTON
RT 1 BOX 207
ARCO ID 83213

UNITED STATES OF AMERICA ACTING THROUGH
USDI BUREAU OF LAND MANAGEMENT
IDAHO STATE OFFICE
1387 S VINNELL WAY
BOISE ID 83709-1657

UNITED STATES OF AMERICA ACTING THROUGH
USDA FARM SERVICE AGENCY
9173 W BARNES STE B
BOISE ID 83709-1555

CHARMAINE AND ROBERT D WADDOUPS
3474 W 2850 N
MOORE ID 83255

CHARMAINE, D KEITH AND DEBORA J WADDOUPS
2778 N 3520 W
MOORE ID 83255

ROBERT D WADDOUPS
PO BOX 42
MOORE ID 83255

KAREN AND MERLIN WADDOUPS
3347 W 3175 N
MOORE ID 83255

KARA AND R DANIEL WADDOUPS
2775 N 3520 W
MOORE ID 83255

JACK L AND LOIS J WALKER
1134 E 97TH N
IDAHO FALLS ID 83401

YOUNG HARVEY WALKER
2338 N 2930 W
ARCO ID 83213

DANIEL A WANSTROM
3492 N 3350 W
MOORE ID 83255

JOHN A WANSTROM JR AND PAMELA WANSTROM
4305 BROME
IDAHO FALLS ID 83401

CAROL WANSTROM
1412 1/2 NEWELL ST
BOISE ID 83705-2839

BRUCE K WARNER
PO BOX 506
MACKAY ID 83251

WESLEY F WATSON
PO BOX 546
ARCO ID 83213

WALTER WESTERNESS
2545 N US HWY 93
ARCO ID 83213

G ALVIN AND GAY D WHEELER
3245 W 3120 N
MOORE ID 83255

CASEY AND SUZANNE WHITWORTH
PO BOX 114
MACKAY ID 83251

WIGHT ENTERPRISE LLC AND WIGHT ENTERPRISES LLC
3798 W 4050 N
MOORE ID 83255

DARRELL AND KAREN WILBURN
4001 N 3200 W
DARLINGTON ID 83255

JUNE T AND LEON L WILLIAMS
RT 1 BOX 20
DARLINGTON ID 83231

CARRIE ANN AND MICHAEL T WILLIAMS
338 AGUSTA DR
ARCO ID 83213

TRUDY WILLIAMS
3962 N 3580 W
MOORE ID 83255

CARTEE J AND CATHERINE E WOOD
RT 1 BOX 49
DARLINGTON ID 83231

L VERNON AND VERNETTA WOODBURY
4021 W HOUSTON RD
MACKAY ID 83251

BRETT WILLIAMS
3962 N 3580 W
MOORE ID 83255