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Sep 03, 2025

DEPARTMENT OF
WATER RESOURCES

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Attorneys for LCSC Enterprises LLC

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

IN THE MATTER OF APPLICATION
FOR TRANSFER NOS. 84488 AND
84490 IN THE NAME OF LCSC
ENTERPRISES LLC

**LCSC ENTERPRISES LLC
MOTION FOR ISSUANCE OF SUBPOENA**

LCSC Enterprises LLC ("LCSC"), by and through its counsel of record, Holden, Kidwell, Hahn & Crapo, P.L.L.C., pursuant to IDAPA 37.01.01.523, hereby moves the hearing officer to issue subpoenas to an employee of the Idaho Department of Water Resources ("IDWR" or "Department") to testify in the above-entitled contested case.

LCSC requests that the hearing officer issue subpoenas for Department employee Jennifer Sukow, P.E., P.G., to appear and be available to testify on September 23-24, 2025, at the IDWR Eastern Regional Office, 900 N. Skyline Drive, Idaho Falls, Idaho, beginning at 9:00 am. While an in-person appearance from both Ms. Sukow is preferred, LCSC has no objection if she appears remotely utilizing IDWR's remote viewing technology.

LCSC intends to call Ms. Sukow to testify about the following IDWR authored reports prepared by Ms. Sukow that LCSC identified in the *LCSC Enterprises LLC Disclosure of Expert*

Reports filed in this matter on April 30, 2025:

1. *IDWR's Review of the Cumulative Effects of Water Right Transfers within the Eastern Snake Plain Aquifer (ESPA)* (September 12, 2019).
2. *Cumulative review of ESPA transfers between 2012 and 2024* (updated on December 5, 2024 for transfers approved through September 30, 2024).

LCSC also intends to ask Ms. Sukow general questions about IDWR's ETRAN3.2 (a simplified version of the fully populated ESPAM2.1 model) and ETRAN3.4 (a simplified version of the ESPAM 2.2 model), including changes to ETRAN 3.4 made from ETRAN 3.2.

DATED this 3rd day of September, 2025.



Robert L. Harris
HOLDEN, KIDWELL, HAHN & CRAPO, P.L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2025, I served a true and correct copy of the following described pleading or document on the attorneys and/or individuals listed below by the method(s) indicated.

DOCUMENT SERVED: LCSC ENTERPRISES LLC MOTION FOR ISSUANCE OF SUBPOENA

ORIGINAL TO: James Cefalo
Hearing Officer, Idaho Department of Water Resources
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ATTORNEYS AND/OR INDIVIDUALS SERVED:

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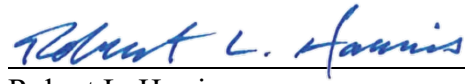
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