RECEIVED
JUN 2 9 2005
DEPARTMENT OF
WATER RESOURCES

Jeffrey C. Fereday (Idaho State Bar # 2719)
Michael C. Creamer (Idaho State Bar # 4030)
GIVENS PURSLEY LLP
601 Bannock Street, Suite 200
P.O. Box 2720
Boise, ID 83701-2720
Telephone: (208) 388-1200
Facsimile: (208) 388-1300

Attorneys for Idaho Ground Water Appropriators, Inc.

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF THE REQUEST FOR ADMINISTRATION IN WATER DISTRICT 120 AND THE REQUEST FOR DELIVERY OF WATER TO SENIOR SURFACE WATER RIGHTS BY A & B IRRIGATION DISTRICT, AMERICAN FALLS RESERVOIR DISTRICT #2, BURLEY IRRIGATION DISTRICT, MILNER IRRIGATION DISTRICT, MINIDOKA IRRIGATION DISTRICT, NORTH SIDE CANAL COMPANY, and TWIN FALLS CANAL COMPANY	**IDAHO GROUND WATER APPROPRIATORS' RENEWED MOTION FOR ORDER AUTHORIZING DISCOVERY**

Idaho Ground Water Appropriators, Inc. ("IGWA"), through its counsel Givens Pursley LLP and on behalf of its ground water district members, Aberdeen-American Falls Ground Water District, Magic Valley Ground Water District, Bingham Ground Water District, North Snake Ground Water District, Bonneville-Jefferson Ground Water District, Southwest Irrigation District, and Madison Ground Water District (the "Ground Water Districts" or "IGWA"), hereby renews its' Motion for Order Authorizing Discovery ("Discovery Motion") filed with the Idaho Department of Water Resources ("Department") on February 18, 2005.

The SWC previously has opposed IGWA's Discovery Motion on the ground that their request for administration did not result in a contested case and therefore discovery was not allowed. The Director, however, in repeated orders issued beginning on February 14, 2005, has deemed this to be a contested case proceeding. Furthermore, the Director's March 9, 2005 Order denying IGWA's Discovery Motion was without prejudice and authorized IGWA to renew the Discovery Motion after the SWC had submitted the information requested by the Department and the Department had considered and responded to that information. Those conditions precedent now have occurred.

IGWA requests that it be authorized to engage in discovery consistent with the Idaho Rules of Civil Procedure, the Department's rules, and any pre-hearing orders that may be issued by the Department governing the timing and/or scope of discovery in this matter.

RESPECTFULLY SUBMITTED this 29th day of June 2005.

GIVENS PURSLEY LLP

Jeffrey C. Fereday
Michael C. Creamer

Attorneys for Idaho Ground Water Appropriators, Inc.

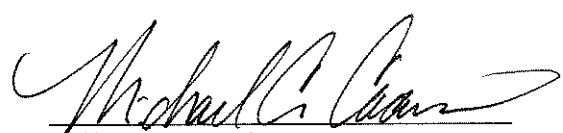
CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of June 2005, I served a true and correct copy of the foregoing by delivering it to the following individuals by the method indicated below, addressed as stated.

Mr. Karl J. Dreher Director Idaho Department of Water Resources 322 East Front Street P.O. Box 83720 Boise, ID 83720-0098	_____ U.S. Mail _____ Facsimile _____ Overnight Mail __X__ Hand Delivery _____ E-mail
C. Tom Arkoosh, Esq. Arkoosh Law Offices, Chtd. 301 Main Street P.O Box 32 Gooding, ID 83330	__X__ U.S. Mail _____ Facsimile _____ Overnight Mail _____ Hand Delivery _____ E-mail
W. Kent Fletcher, Esq. Fletcher Law Office P.O. Box 248 Burley, ID 83318-0248	__X__ U.S. Mail _____ Facsimile _____ Overnight Mail _____ Hand Delivery _____ E-mail
Roger D. Ling, Esq. Ling, Robinson & Walker 615 H St. P.O. Box 396 Rupert, ID 83350-0396	__X__ U.S. Mail _____ Facsimile _____ Overnight Mail _____ Hand Delivery _____ E-mail
John A. Rosholt, Esq. John K. Simpson, Esq. Travis L. Thompson, Esq. Barker, Rosholt & Simpson 113 Main Avenue West, Ste. 303 Twin Falls, ID 83301-6167	__X__ U.S. Mail _____ Facsimile _____ Overnight Mail _____ Hand Delivery _____ E-mail
Kathleen Marion Carr, Esq. Office of the Field Solicitor U.S. Department of the Interior 550 West Fort Street, MSC 020 Boise, ID 83724-0020	__X__ U.S. Mail _____ Facsimile _____ Overnight Mail _____ Hand Delivery _____ 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 Overnight Mail Hand Delivery E-mail
Scott L. Campbell, Esq. Moffatt Thomas Barrett Rock & Fields, Chtd. 101 S. Capitol Blvd., 10th Floor P.O. Box 829 Boise, ID 83701-0829	X 	U.S. Mail Facsimile Overnight Mail Hand Delivery E-mail
Michael S. Gilmore, Esq. Deputy Attorney General Civil Litigation Division Office of the Attorney General P.O. Box 83720 Boise, ID 83720-0010	X 	U.S. Mail Facsimile Overnight Mail Hand Delivery E-mail
Josephine P. Beeman, Esq. Beeman & Associates PC 409 West Jefferson Boise, ID 83702-6049	X 	U.S. Mail Facsimile Overnight Mail Hand Delivery E-mail
Sarah A. Klahn, Esq. White & Jankowski, LLP 511 16th Street, Suite 500 Denver, CO 80202	X 	U.S. Mail Facsimile Overnight Mail Hand Delivery E-mail
Terry T. Uhling, Esq. J.R. Simplot Company 999 Main Street P.O. Box 27 Boise, ID 83707	X 	U.S. Mail Facsimile Overnight Mail Hand Delivery E-mail
James C. Tucker, Esq. Idaho Power Company 1221 West Idaho P.O. Box 70 Boise, ID 83707	X 	U.S. Mail Facsimile Overnight Mail Hand Delivery E-mail

James S. Lochhead, Esq. Adam T. DeVoe, Esq. Brownstein, Hyatt & Farber P.C. 410 17th Street, 22nd Floor Denver, CO 80202	_X_ U.S. Mail ___ Facsimile ___ Overnight Mail ___ Hand Delivery ___ E-mail
Mr. Ron Carlson Mr. Lewis Rounds Idaho Department of Water Resources Eastern Regional Office 900 North Skyline Dr. Idaho Falls, ID 83402-6105	_X_ U.S. Mail ___ Facsimile ___ Overnight Mail ___ Hand Delivery ___ E-mail
Mr. Allen Merritt Ms. Cindy Yenter Idaho Department of Water Resources Southern Regional Office 1341 Fillmore St., Ste. 200 Twin Falls, ID 83301-3033	_X_ U.S. Mail ___ Facsimile ___ Overnight Mail ___ Hand Delivery ___ E-mail



Jeffrey C. Fereday
Michael C. Creamer