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DEPARTMENT OF
WATER RESOURCES

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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' MOTION FOR STATUS CONFERENCE**

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"), hereby moves the Director, of the Idaho Department of Water Resources ("Director") to convene a status conference in this matter on **April 26 or 27, 2005**. The reasons for this motion are as follows:

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1. The Director's April 19, 2005 Order in this matter ("Order") is far-reaching and complex. The Ground Water Districts need clarification about how the Director contemplates that the Order would be implemented. A status conference would provide all parties the opportunity to obtain this clarification. Examples of the areas where the Ground Water Districts have questions include, but are not limited to:

a. The means by which multi-year accounting process both for provision of replacement water and the disposition of it for or on behalf of the Surface Water Coalition members.

b. If dry-up of irrigated land is required or offered to meet a particular reach gain target, what flexibility is available to ground water districts in determining which acres will be dried up?

c. How are mitigation amounts for non-irrigation uses to be determined? Can these users fully participate in a ground water district's mitigation program by providing funding to the ground water district?

2. The April 19 Order establishes certain deadlines, one of which is April 29, 2005. It would advance the Director's goal of implementation of the Order's requirements for the Ground Water Districts to discuss with the Director and the parties what deliverables and schedules are necessary to meet these deadlines.

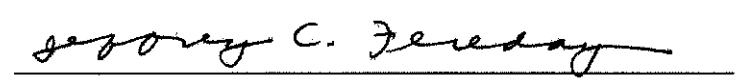
3. A status conference would provide the parties an opportunity to discuss the opportunity for settlement, on either an interim or long-term basis.

4. In making this Motion, the Ground Water Districts are not proposing to argue the merits of the Order, but rather to understand how the Director intends to implement it.

By submitting this Motion, the Ground Water Districts do not waive any rights they have to file further motions in this matter, including motions challenging certain aspects of the Order.

RESPECTFULLY SUBMITTED this 21st day of April 2005.

GIVENS PURSLEY LLP



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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of April 2005, I served a true and correct copy of the foregoing by delivering the same to each of the following individuals by the method indicated below, addressed as follows:

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