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Attorneys for Idaho Ground Water Appropriators, Inc.

RECEIVED
SEP 29 2005
Department of Water Resources

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF DISTRIBUTION OF WATER TO VARIOUS WATER RIGHTS HELD BY OR FOR THE BENEFIT OF 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.	**IGWA'S NOTICE OF TAKING DEPOSITION DUCES TECUM OF RONALD D. CARLSON**

TO: RONALD D. CARLSON, IN HIS CAPACITY AS AN EMPLOYEE OF THE IDAHO DEPARTMENT OF WATER RESOURCES AND HIS ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that counsel for Idaho Ground Water Appropriators, Inc. ("IGWA") will take the testimony upon oral examination of Ronald D. Carlson pursuant to Rule 30 and other applicable rules of the Idaho Rules of Civil Procedure. The deposition will be taken before a Notary Public or other duly qualified person, on **October 11, 2005 at 9:00 a.m.**, and continuing from day to day until completion, at the offices of the **Idaho Department of Water Resources, Eastern Regional Office, 900 North Skyline Dr., Idaho Falls, Idaho.**

Pursuant to Idaho Rules of Civil Procedure 26, 30(b)5 and 34, you are further instructed to bring to the deposition all documents examined, analyzed, relied upon, incorporated or utilized by you in connection with the above-captioned delivery call, in addition to all documents the reviewed by you in preparing for this deposition.

DEFINITIONS

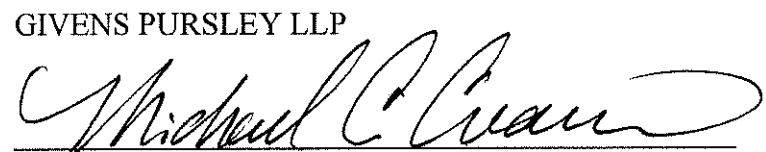
"Document" or "documents" shall mean the original, all copies and drafts of papers and writings of every kind, description and form, and all mechanical, magnetic media and electronic recordings, records, and data of every kind, description and form, and all photographs of every kind, and including, without limiting the generality of the foregoing, the following: correspondence, notes, e-mails, memoranda, reports, notebooks, binders, drawings, studies, analyses, drafts, diaries, intra- or inter-office communications, reports, canceled checks, minutes, bulletins, circulars, pamphlets, telegrams, typewritten and handwritten notes, letters, instructions, work assignments, messages (including reports, notes and memoranda of telephone conversations and conferences), telephone statements, calendar and diary entries, desk calendars, appointment books, job or transaction files, books of account, ledgers, bank statements, promissory notes, invoices, charge slips, working papers, lab books, lab notes, lab journals or notebooks, evaluation or appraisal reports, pleadings, transcripts of testimony or other documents filed or prepared in connection with any court or agency or other proceeding, deeds, deeds of trust, mortgages, contracts, agreements, assignments, instruments, charges, opinions, official statements, prospectuses, feasibility studies, trusts, releases of claims, charters, certificates, licenses, leases, invoices, computer printouts or programs, summaries, précis, audio, video or sound recordings, cassette tapes, video recorded, electronic or laser recorded or photographed

information. Documents are to be taken as including all attachments, enclosures and other documents that are attached to, relate to or refer to such documents.

PLEASE TAKE FURTHER NOTICE that the deposition may be videotaped (recorded by video technology) and that said videotaped deposition may be used, in whole or in part, at the trial in this matter. If not completed on the date specified above, the deposition of such person or persons will be continued.

DATED this 29th day of September 2005.

GIVENS PURSLEY LLP



Jeffrey C. Fereday
Michael C. Creamer
Brad V. Sneed
Attorneys for Idaho Ground Water Appropriators, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of September 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 960 Broadway Street, Suite 400 Boise, ID 83706	__X__ U.S. Mail _____ Facsimile _____ Overnight Mail _____ Hand Delivery _____ E-mail

Matt J. Howard, Esq. 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
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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

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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

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