RECEIVED
AUG 23 2005
DEPARTMENT OF
WATER RESOURCES

Josephine P. Beeman (ISB # 1806)
Beeman & Associates, P.C.
409 West Jefferson Street
Boise, ID 83702
Telephone: (208) 331-0950
Facsimile: (208) 331-0954
office@beemanlaw.com

Sarah A. Klahn
William A. Hillhouse II
White & Jankowski, LLP
511 16th St., Ste. 500
Denver, CO 80202
Telephone: (303) 595-9441
Facsimile: (303) 825-5632
sarahk@white-jankowski.com
billh@white-jankowski.com

Attorneys for City of Pocatello

Jeffrey C. Fereday (ISB # 2719)
Michael C. Creamer (ISB # 4030)
Brad V. Sneed (ISB # 6254)
GIVENS PURSLEY LLP
601 Bannock Street, Suite 200
P.O. Box 2720
Boise, ID 83701-2720
Telephone: (208) 388-1200
Facsimile: (208) 388-1300
jefffereday@givenspursley.com
mcc@givenspursley.com

Attorneys for Idaho Ground Water Appropriators, Inc.

Michael S. Gilmore (ISB # 1625)
Deputy Attorney General
Civil Litigation Division
Office of the Attorney General
Len B. Jordan Bldg., Lower Level
P.O. Box 83720
Boise, ID 83720-0010
Telephone: (208) 334-4130
Facsimile: (208) 334-2830
mike.gilmore@ag.idaho.gov

Attorneys for State Agency Ground Water Users

BEFORE THE DIRECTOR
OF 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, POCATELLO'S AND STATE AGENCY GROUND WATER USERS' JOINT WRITTEN REQUEST TO DEPOSE IDAHO DEPARTMENT OF WATER RESOURCES EMPLOYEES**

Pursuant to the *Scheduling Order* issued by the Department on July 22, 2005 ("Scheduling Order"), Idaho Ground Water Appropriators, Inc ("IGWA"), the City of Pocatello ("Pocatello"), and the State Agency Ground Water Users, jointly submit this request to depose Idaho Department of Water Resources ("Department") employees. Paragraph 2(a) of the Scheduling Order provides that "Department employees will be available for deposition upon written request."

The Parties request that the following Department employees (including certain Department contractors) be made available for depositions in Boise, at the State Office of the Idaho Department of Water Resources, or at the offices of Mr. Ron Carlson in Idaho Falls, beginning during the week of August 29, 2005, or as soon thereafter as practicable, given employees' and contractors' schedules:

Ron Carlson, Water Master, Water District 01

Tim Luke, Water Distribution Section Manager

Allan Wylie, Technical

Michael Ciscell, Adjudication

David R. Tuthill, Jr., Administrator, Water Management Division

Dr. Donna Cosgrove, University of Idaho, Idaho Falls Campus, Idaho Water Resources Research Institute, Hydrogeology/Modeling.

Bryce Contor, University of Idaho, Idaho Falls Campus, Idaho Water Resources Research Institute, Hydrogeology/Modeling.

Any responsible Department representative(s) who can answer questions about the facts underlying any orders issued in this case, and materials that have been and/or will be officially noticed in this proceeding. (IDAPA 37.01.01.602 and Idaho Code 67-5251.)

The foregoing notwithstanding, the above parties recognize that the Director, as the decision maker in this matter, should not be deposed, and therefore do not seek his deposition.

If these depositions cannot be completed during the week of August 29, then it is requested that they be completed later at mutually acceptable times.

The above Parties reserve the right to request additional depositions of Department employees (including Department contractors) as discovery progresses and will file additional requests with the Department if additional depositions are necessary. The above Parties submitting this Joint Written Request anticipate that all parties to this proceeding, including those not signatories to this pleading, will participate in the depositions.

Dated this 23rd day of August 2005.

Jeffrey C. Fereday
for Josephine P. Beeman
Beeman & Associates, P.C.
Attorneys for City of Pocatello

Jeffrey C. Fereday
for Sarah A. Klahn
White & Jankowski, LLP
Attorneys for City of Pocatello

Jeffrey C. Fereday
Jeffrey C. Fereday
Givens Pursley LLP
Attorneys for Idaho Ground Water Appropriators

Michael S. Gilmore
Michael S. Gilmore
Deputy Attorney General, State of Idaho
Attorney for State Agency Ground Water Users

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of August 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	_____ _____ _____ X _____	U.S. Mail Facsimile Overnight Mail Hand Delivery E-mail
C. Tom Arkoosh, Esq. Arkoosh Law Offices, Chtd. 301 Main Street P.O Box 32 Gooding, ID 83330	X _____ _____ _____ 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 _____ _____ _____ 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 _____ _____ _____ 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 _____ _____ _____ 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 _____ _____ _____ 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 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 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 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 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 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 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 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 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 X 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 X E-mail

Jeffrey C. Fereday

Jeffrey C. Fereday