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Attorneys for Rangen, Inc.

RECEIVED
MAR 03 2014
DEPARTMENT OF
WATER RESOURCES

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF THE MITIGATION PLAN FILED BY THE IDAHO GROUND WATER APPROPRIATORS FOR THE DISTRIBUTION OF WATER TO WATER RIGHT NOS. 36-02551 AND 36-07694 IN THE NAME OF RANGEN, INC.	Docket No. CM-MP-2014-001 **I.R.C.P. 30(b)(6) NOTICE OF TAKING DEPOSITION DUCES TECUM OF NORTH SNAKE GROUNDWATER DISTRICT** **Tuesday, March 4, 2014** **1:30 p.m.** **May, Browning & May, PLLC** **516 Hansen Street East** **Twin Falls, ID 83301**

TO: THE NORTH SNAKE GROUNDWATER DISTRICT and its attorneys of record:

PLEASE TAKE NOTICE that Rangen, Inc., will take the deposition of the North Snake Groundwater District before a certified Court Reporter, in accordance with the Rules of Civil Procedure of the State of Idaho, on the 4th day of March, 2014, at the hour of 1:30 p.m. at the Offices of May, Browning & May, PLLC, 516 Hansen Street East, Twin Falls, ID 83301.

Pursuant to I.R.C.P. 30(b)(6), the Deponent is required to designate one or more officers, directors, managing agents or other person(s) who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify, regarding the topics set forth below:

- Mitigation Plan filed by IGWA in the above-captioned matter
- The Sandy Pipeline
- Delivery of water to Butch Morris and/or other water users through the Sandy Pipeline

The Deponent is further required to identify and bring with him the following documents:

1. Copies of all mitigation plans submitted by, or on behalf of Northsnake Groundwater District, which have been approved by IDWR.

2. Copies of maps, diagrams, photographs, drawings showing Sandy Ponds and Sandy Pipeline.

3. Copies of all agreements or other documents which pertain to the construction of the Sandy Ponds and Sandy Pipeline.

4. Copies of all agreements or other documents which pertain to the operation and use of the Sandy Ponds and Sandy Pipeline.

5. Copies of all documents which pertain to the purchase of water delivered through the Sandy Pipeline.

6. Copies of all documents which pertain to the ownership of the Sandy Ponds and Sandy Pipeline.

7. Copies of all documents which pertain to who is authorized to divert water from the Sandy Pipeline.

8. Copies of all agreements or other documents which authorize the use of water from the Sandy Pipeline. This includes, but is not limited to, agreements between Northside Canal Company and/or North Snake Groundwater District, and/or Howard "Butch" Morris.

9. Copies of all documents which reflect the amount of water that has been delivered to the Sandy Pipeline since it became operational.

10. Copies of all documents which reflect the amount of water delivered to the Sandy Ponds since they became operational.

11. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by Howard "Butch" Morris since the Sandy Pipeline became operational.

12. Copies of all documents which reflect the amount of water that has been diverted from the Martin-Curren Tunnel by Howard "Butch" Morris.

13. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by J. and/or Tim Musser since the Sandy Pipeline became operational.

14. Copies of all documents which reflect the amount of water that has been diverted from the Martin-Curren Tunnel for use by J. Musser, T. Musser or their heirs.

15. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pieline for use by Walter and/or Margaret Candy.

16. Copies of all documents which reflect the amount of water that has been diverted from the Martin-Curren Tunnel for use by Walter and/or Margaret Candy.

17. Copies of all documents which reflect the amount of water that has been diverted from the Sandy Pipeline for use by any other water user not identified herein.

17. Any and all documents, books, papers, recordings, electronic data, emails, communications, photographs, or other documents or items reviewed in preparation for this Rule 30(b)(6) deposition.

The term "document" as used above includes, but is not limited to, notes (oral or written), memoranda, reports, studies, maps, surveys, plans, drawings, photographs, calculations, spreadsheets and any computer analyses, whether written or electronic in format.

All parties and their counsel are invited to attend. The oral examination will continue from day to day until completed.

DATED this 3 day of March, 2014.

MAY, BROWNING & MAY, PLLC

By _____
J. Justin May

CERTIFICATE OF SERVICE

The undersigned, a resident attorney of the State of Idaho, hereby certifies that on the ____ day of March, 2014, I caused a true and correct copy of the foregoing document to be served using the method indicated upon the following:

Original: Director Gary Spackman Idaho Department of Water Resources P.O. Box 83720 Boise, ID 83720-0098 Deborah.Gibson@idwr.idaho.gov	Hand Delivery ☑ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑
Garrick Baxter Chris Bromley Idaho Department of Water Resources P.O. Box 83720 Boise, Idaho 83720-0098 garrick.baxter@idwr.idaho.gov chris.bromley@idwr.idaho.gov	Hand Delivery ☑ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑

Randall C. Budge Candice M. McHugh Thomas J. Budge RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED P.O. Box 1391 101 South Capitol Blvd, Ste 300 Boise, ID 83704-1391 Fax: 208-433-0167 rcb@racinelaw.net cmm@racinelaw.net tjb@racinelaw.net	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑
Sarah Klahn Mitra Pemberton WHITE & JANKOWSKI Kittredge Building, 511 16th Street, Suite 500 Denver, CO 80202 sarahk@white-jankowski.com mitrap@white-jankowski.com	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑
Dean Tranmer City of Pocatello P.O. Box 4169 Pocatello, ID 83201 dtranmer@pocatello.us	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑
John K. Simpson Travis L. Thompson Paul L. Arrington Barker Rosholt & Simpson, L.L.P. 195 River Vista Place, Suite 204 Twin Falls, ID 83301-3029 Facsimile: (208) 735-2444 tlt@idahowaters.com jks@idahowaters.com	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑
C. Thomas Arkoosh ARKOOSH LAW OFFICES 802 West Bannock, Suite 900 Boise, ID 83701 tom.arkoosh@arkoosh.com	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑
W. Kent Fletcher Fletcher Law Office P.O. Box 248 Burley, ID 83318 wkf@pmt.org	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑

Jerry R. Rigby Hyrum Erickson Robert H. Wood Rigby, Andrus & Rigby, Chartered 25 North Second East Rexburg, ID 83440 jrigby@rex-law.com herickson@rex-law.com rwood@rex-law.com	Hand Delivery ☐ U.S. Mail ☐ Facsimile ☐ Federal Express ☐ E-Mail ☑

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