

Exhibit No.	Description
307	Appendix F to Spronk Expert Report – Cost Information Provided to IDWR by A&B Irrigation District, January 22, 2008
308	Appendix G to Spronk Expert Report – Summary of Well Drillings and Well Deepenings
309	Appendix H to Spronk Expert Report – Selected USBR FOIA Documents
310	Appendix I to Spronk Expert Report – Changes in Surface and Ground Water Irrigated Areas on the ESPA
311	Table A-1 to Spronk Expert Report – Analysis of Farm Delivery Requirements
312	Table A-2 to Spronk Expert Report – Analysis of Farm Delivery Requirements
313	Table A-3 to Spronk Expert Report – Crop Weighted CIR
314	Figure 1 to Spronk Expert Report – City of Pocatello Wells
315	Figure 2 to Spronk Expert Report – Location Map Eastern Snake Plain Aquifer and A&B Irrigation District Service Area
316	Figure 3 to Spronk Expert Report – Location Map A&B Irrigation District Area Service Area
317	Figure 4 to Spronk Expert Report – Reported 2006 Farm Headgate Deliveries Unit B Well Systems A&B Irrigation District
318	Figure 5 to Spronk Expert Report – Reported 2007 Farm Headgate Deliveries Unit B Well Systems A&B Irrigation District
319	Figure 6 to Spronk Expert Report – Farm Headgate Deliveries A&B Irrigation District Unit B
320	Figure 7 to Spronk Expert Report – Monthly Average Farm Headgate Delivery A&B Irrigation District Unit B
321	Figure 8 to Spronk Expert Report – Well Construction and Maintenance Well Time Line Well 1A921 A&B Irrigation District Unit B
322	Figure 9 to Spronk Expert Report – Well Construction and Maintenance Well Time Line Well 7A922 A&B Irrigation District Unit B
323	Figure 10 to Spronk Expert Report – Well Construction and Maintenance Well Time Line Well 7B922 A&B Irrigation District Unit B
324	Figure 11 to Spronk Expert Report – Timeline of Well Drilling and Well Deepening A&B Irrigation District Unit B
325	Table 1 to Spronk Expert Report – City of Pocatello Summary of Water Rights
326	Table 2 to Spronk Expert Report – Summary of Ground Water Rights A&B Irrigation District Unit B
327	Table 3 to Spronk Expert Report – Well System Acreage A&B Irrigation District Unit B 2007
328	Table 4 to Spronk Expert Report – Summary of Well Systems Reported Short at Some Time During 1981-2007 A&B Irrigation District Unit B
329	Table 5 to Spronk Expert Report – Reported Farm Headgate Deliveries by Well System Sorted by Low Delivery A&B Irrigation District Unit B 2006
330	Table 6 to Spronk Expert Report – Reported Farm Headgate Deliveries by Well System Sorted by Low Delivery A&B Irrigation District Unit B 2007
331	Table 7 to Spronk Expert Report – Farm Headgate Deliveries A&B Irrigation District Unit B

Exhibit No.	Description
332	Table 8 to Spronk Expert Report – Monthly Average Discharge Rate and Farm Headgate Delivery A&B Irrigation District Unit B
333	Resume of Karen L. Wogsland
334	Spronk Water Engineers' Rebuttal Report, August 26, 2008
335	August 18, 2008 photographs taken by Gregory K. Sullivan, P.E. of certain farms within the A&B Irrigation District service area (to be provided on CD)
336	Map showing location where photos in Exhibit 335 were taken (to be provided on CD or in electronic form)

RECEIVED

AUG 27 2008

DEPARTMENT OF
WATER RESOURCES

1 A. Dean Tranmer I.B. # 2793
2 City of Pocatello
3 P. O. Box 4169
4 Pocatello, ID 83201
5 (208) 234-6149
6 (208) 234-6297 (Fax)
7 dtranmer@pocatello.us

8 Sarah A. Klahn, I.B. #7928
9 Kelly Snodgrass
10 White & Jankowski, LLP
11 511 Sixteenth Street, Suite 500
12 Denver, Colorado 80202
13 (303) 595-9441
14 (303) 825-5632 (Fax)
15 sarahk@white-jankowski.com

16 ATTORNEYS FOR THE CITY OF POCA TELLO

17 **BEFORE THE DEPARTMENT OF WATER RESOURCES**

18 **OF THE STATE OF IDAHO**

19 IN THE MATTER OF PETITION FOR)
20 DELIVERY CALL OF THE A&B)
21 IRRIGATION DISTRICT FOR)
22 THE DELIVERY OF GROUND WATER)
23 AND THE CREATION OF A GROUND WATER)
24 MANAGEMENT DISTRICT)
25 _____)

26 **REBUTTAL TESTIMONY OF**
27 **GREGORY K. SULLIVAN, P.E.**

28 **SUBMITTED ON BEHALF OF**
THE CITY OF POCA TELLO

AUGUST 27, 2008

1 Q: Please state your name and business address.

2 A: Gregory K. Sullivan, 1000 Logan Street, Denver, Colorado 80203

3 Q: Have you been engaged by the City of Pocatello to present engineering testimony in this
4 case?

5 A: Yes.

6 Q: And did you previously testify as an expert in the Surface Water Coalition Delivery Call
7 matter that went to hearing in January and February of 2008?

8 A: Yes.

9 Q: Have you previously submitted an expert report and testimony in the captioned matter, the
10 A&B Irrigation District ground water delivery call?

11 A: Yes.

12 Q: Have you prepared a rebuttal report in this matter?

13 A: Yes.

14 Q: Does your report identify the bases of your opinions?

15 A: Yes.

16 Q: Does that report contain your opinions regarding the work and opinions expressed by A&B's
17 consultants in this case?

18 A: Yes.

19 Q: Please summarize your rebuttal opinions:

20 A: A&B's water right that is the subject of this delivery call is appurtenant to all of its senior
21 acres. The A&B experts' analysis of shortages is improper insofar as it looks at questions of
22 supply and demand on a well-system by well-system basis.
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1 A&B's analysis did not consider the availability of other sources of water, including
2 private wells, surface water supplies serving conversion acres, drain/re-lift pumping, and new
3 supplemental wells.
4

5 Even if it were determined to be appropriate to examine the A&B delivery call in this
6 way, A&B's consultants rely on faulty assumptions in certain of the inputs to their water
7 requirements analysis. For example:

- 8 • A&B excludes soil moisture from consideration in its irrigation requirements
9 analysis.
- 10 • A&B used a district-wide cropping pattern, rather than a well-system-by-well-
11 system cropping pattern.
12

13 In addition to the problems with A&B's demand computations, the irrigation shortages
14 they computed are unreasonable. Shortages were computed based on differences between
15 monthly demand and reported monthly pumping, although A&B's own records showed that
16 almost all well systems had the capacity to produce more water than was actually pumped.
17

18 Contrary to A&B's assertions in its opening report, there is no long-term trend in ET, and
19 the trend noted by A&B from 1990 forward is likely just the result of a series of wet years
20 followed by a series of dry years, rather than an indication that ET has increased.
21

22 If the deficiencies of the A&B analysis are addressed, there would be little or no
23 shortages remaining. Therefore, curtailing all junior wells on the ESPA to mitigate any minor
24 remaining shortages would be contrary to the maximum utilization provisions of the conjunctive
25 management rules.
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