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DEPARTMENT OF
WATER RESOURCES

KATHLEEN MARION CARR
Office of the Field Solicitor
550 W. Fort Street, MSC 020
Boise, Idaho 83724
Telephone: (208) 334-1911
Facsimile: (208) 334-1918

U.S. Department of the Interior, Bureau of Reclamation

**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) **RECLAMATION'S MOTION FOR**
IRRIGATION DISTRICT, AMERICAN) **AUTHORITY TO CONDUCT**
FALLS RESERVOIR DISTRICT #2,) **DISCOVERY**
BURLEY IRRIGATION DISTRICT,)
MILNER IRRIGATION DISTRICT,)
MINIDOKA IRRIGATION DISTRICT,)
NORTH SIDE CANAL COMPANY, AND)
TWIN FALLS CANAL COMPANY)
_____)

COMES NOW the U. S. Department of the Interior, Bureau of Reclamation ("Reclamation"), by and through its attorney, Kathleen Marion Carr, Office of the Field Solicitor, and files this Motion to Conduct Discovery of Parties and of the IDWR Staff.

Pursuant to Rule 521 of IDWR's Rules of Procedure, IDAPA 37.01.01.521, Reclamation hereby moves for authority to conduct all forms of discovery listed in Rule 520.01.a-d and to direct that discovery:

- (a) to all other parties in this proceeding, and
- (b) to the IDWR Staff to the extent that the presiding officer in this proceeding may take official notice of

(i) “any facts that could be judicially noticed in the courts of this state,” Idaho Code § 67-5251(4)(a),

(ii) any “generally recognized technical or scientific facts within [IDWR’s] specialized knowledge,” § 67-5251(4)(b), and

(iii) “specific facts or materials noticed and the source thereof, including any [IDWR] staff memoranda and data,” § 67-5251, relevant to this proceeding.

Reclamation respectfully requests that the Director issue an order authorizing Reclamation to conduct discovery as provided above in order to allow a full and fair discussion and analysis of the issues in this matter. Moreover, Reclamation requests that its discovery be allowed to commence as soon as possible.

Respectfully submitted this 7 day of July, 2005.

U.S. Department of the Interior, Bureau of Reclamation

By



KATHLEEN MARION CARR

CERTIFICATE OF SERVICE

The undersigned certifies that on them / / day of July 2005, a true and correct copy of **RECLAMATION'S OPPOSITION TO IGWA'S MOTION TO CONSOLIDATE** was served on the following person(s) as shown below:

Director, Karl J. Dreher
Idaho Department of Water Resources
322 East Front Street
P.O. Box 83720
Boise, ID 83720-0098
By Hand Carry and Facsimile
(208) 287-6700

John K. Simpson
Barker Rosholt & Simpson, LLP
P. O. Box 2139
Boise, ID 83701-2139
By U.S. Mail and Facsimile
(208) 344-6034

Travis Thompson
Barker Rosholt & Simpson, LLP
113 Main St. W, Ste. 303
Twin Falls, ID 83301-6167
By U.S. Mail and Facsimile
(208) 735-2444

Roger Ling
Ling Robinson & Walker
P. O. Box 396
Rupert, ID 83350
By U.S. Mail and Facsimile
(208) 436-6804

Jeffrey C. Fereday
Michael C. Creamer
Givens Pursley, LLP
P. O. Box 2720
Boise, ID 83701
By U.S. Mail and Facsimile
(208) 388-1300

James S. Lochhead
Adam T. DeVoe
Brownstein Hyatt & Farber, P.C.
410 17th St., 22nd Floor
Denver, CO 80202
By U.S. Mail and Facsimile
(303) 223-1111

W. Kent Fletcher
Fletcher Law Office
P. O. Box 248
Burley, ID 83318
By U.S. Mail and Facsimile
(208) 878-2548

Scott L. Campbell
Moffatt Thomas Barrett Rock & Fields,
Chtd
P. O. Box 829
Boise, ID 83701
By U.S. Mail and Facsimile
(208) 385-5384

C. Thomas Arkoosh
Arkoosh Law Office, Chtd.
P. O. Box 32
Gooding, ID 83330-0032
By U.S. Mail and Facsimile
(208) 934-8873

James Tucker
Idaho Power Company
1221 W. Idaho St.
Boise ID 83702
By U.S. Mail and Facsimile
(208) 388-6935

Josephine P. Beeman
Beeman & Associates, P.C.
409 West Jefferson Street
Boise, ID 83702
By U.S. Mail and Facsimile
(208)331-0954

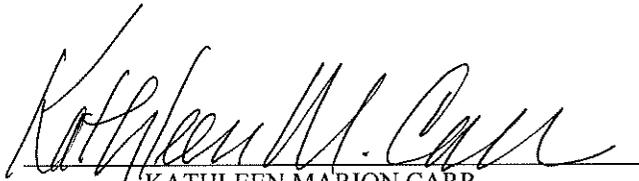
Michael S. Gilmore
Deputy Attorney General, State of Idaho
Statehouse, Room 210
Boise, ID 83720
By U.S. Mail and Facsimile
(208) 334-2830

Idaho Department of Water Resources
Eastern Region Office
900 N. Skyline Dr.
Idaho Falls, ID 83402-6105
By U.S. Mail and Facsimile
(208) 525-7177

U.S. Bureau of Reclamation
Matt Howard, PN-3130
1150 N. Curtis Road
Boise, ID 83706-1234
By U.S. Mail and Facsimile
(208) 378-5305

Sarah A. Klahn
WHITE & JANKOWSKI, LLP
511 16th Street, Ste. 500
Denver, CO 80202
By U.S. Mail and Facsimile
(303) 825-5632

Idaho Department of Water Resources
Southern Region Office
1341 Fillmore St., Ste. 200
Twin Falls, ID 83301-3033
By U.S. Mail and Facsimile
(208) 736-3037


KATHLEEN MARION CARR