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August 22, 2011

VIA U.S. MAIL
VIA E-MAIL

Idaho Department of Water Resources
Attn: Interim Director Gary Spackman
P.O. Box 83720
Boise, Idaho 83720-0098

Re: CM-DC-2011-003 (SeaPac Delivery Call for Water Right Nos. 36-07072 and 36-8356)

Dear Mr. Spackman,

Pursuant to the agreement reached at the August 8, 2011, scheduling conference, whereby each party to the litigation will be provided the same information from the Department, SeaPac requests a copy of the information produced at the behest of the Idaho Ground Water Appropriators, Inc., on August 18, 2011, including:

- All data sets, model files and related documents generated or used in any analysis of the SeaPac delivery call or the spring source for water right nos. 36-07072 and 36-8356, the Magic Springs complex, Thousands Springs or the Thousands Springs reach of the Snake River.

- All historical records of measured water flows in the SeaPac facility that is supplied by water right nos. 36-07072 and 36-8356, including discharges, diversions and bypasses at each spring outlet.

- All correspondence between the Department and owners/operators of the SeaPac facility and Wendell Starke.

- All records and documents associated with any wells, well pumps, groundwater production, and groundwater quality located within one mile of the spring source for water right nos. 36-07072 and 36-8356.

- All documents and records associated with geologic, hydrologic and hydrogeologic investigations within two miles of the spring source for water right nos. 36-07072 and 36-8356.

Please also provide the same verification that the water right files available online for water right nos. 36-07072 and 36-8356 are complete and contain all permits, licenses and decrees relative to the water right at issue, including all related documentation and field inspection and verification reports made by the Department. If the online water right riles are not complete, please provide the same information on where the complete files may be found and when they can be inspected and copied.

We appreciate your attention to this matter, and please do not hesitate to call with any questions.

Sincerely,

HAWLEY TROXELL ENNIS & HAWLEY LLP

Jake D. McGrady

cc: Candice McHugh