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APR 30 2015
DEPARTMENT OF
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IDAHO DEPARTMENT OF WATER RESOURCES

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

IN THE MATTER OF IGWA'S
MITIGATION PLAN FOR
CONVERSIONS, DRY-UPS, AND
RECHARGE

Docket No. CM-DC-2010-001
Docket No. CM-MP-2009-06

**IGWA's Request for Mitigation
Credit to the SWC for Aquifer
Enhancement Activities
(2015)**

Idaho Ground Water Appropriators, Inc. (IGWA), acting for and on behalf of its members, through counsel, hereby requests mitigation credit toward IGWA's mitigation obligation to the Surface Water Coalition ("SWC") for the 2015 irrigation season.

IGWA has for many years engaged on conversions, recharge, and CREP activities (referred to collectively herein as "aquifer enhancement activities") that enhance the water supplies of the members of the SWC. The *Order Approving Mitigation* issued by the Department in Docket No. CM-MP-2009-06 on May 14, 2010, entitles IGWA to mitigation credit for these activities.

Filed herewith is the Affidavit of Charles M. Brendecke. Exhibit A to

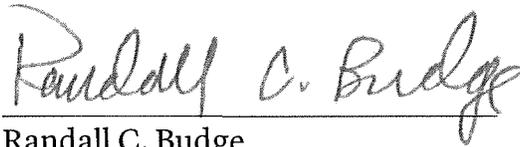
the Brendecke Affidavit contains a table summarizing the benefits to the SWC from aquifer enhancement activities based on modelled gains to the Near Blackfoot to Minidoka reach of the Snake River.

Based on the information contained in Dr. Brendecke's Affidavit, IGWA requests a credit of **13,297 acre-feet** towards its mitigation obligation to the SWC for reach gains during the 2015 irrigation season from activities by IGWA and its member Southwest Irrigation District.

IGWA also requests that the water supplies of the SWC reflect the non-irrigation accruals to the Near Blackfoot to Minidoka reach, which Dr. Brendecke calculates to be **8,889 acre-feet**.

RESPECTFULLY SUBMITTED this 30th day of April, 2015.

RACINE OLSON NYE BUDGE & BAILEY,
CHARTERED

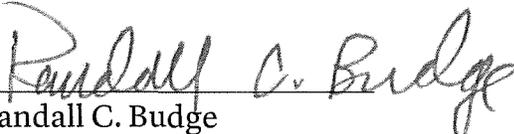
A handwritten signature in cursive script that reads "Randall C. Budge". The signature is written in black ink and is positioned above a horizontal line.

Randall C. Budge
Thomas J. Budge

Attorneys for IGWA

CERTIFICATE OF SERVICE

I certify that on this 30th day of April, 2015, a true and correct copy of the foregoing was served on the following persons in the manner indicated:


 Randall C. Budge
 Thomas J. Budge

Director Gary Spackman Idaho Department of Water Resources PO Box 83720 Boise, ID 83720-0098 Deborah.gibson@idwr.idaho.gov	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Email
Deputy Attorneys General Garrick L. Baxter Emmi L. Blades Idaho Department of Water Resources P.O. Box 83720 Boise, Idaho 83720-0098 Fax: 208-287-6700 garrick.baxter@idwr.idaho.gov emmi.blades@idwr.idaho.gov kimi.white@idwr.idaho.gov	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Email
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<p>Kathleen Marion Carr US Dept. Interior 960 Broadway Ste 400 Boise, Idaho 83706 kathleenmarion.carr@sol.doi.gov</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Email</p>
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<p>Matt Howard US Bureau of Reclamation 1150 N Curtis Road Boise, Id 83706-1234 mhoward@pn.usbr.gov</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Email</p>