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Name: ALLEN FARMS INC
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Re: Proposed Change to Conjunctive Management Rule 50

Basin 34 has been told numerous times since the Snake River Basin Adjudication that we would never be involved in Eastern Snake Plain Aquifer, (ESPA), the "A-line". As a result, we were unaware that we were even in the Eastern Snake Plain Aquifer Model, (ESPAM). Some of the boundaries of the ESPAM seem arbitrary & political. People that are on the Modeling Committee have obviously represented and protected the interests of whomever or whatever organization they represented. We were never approached to be on the Modeling Committee. Decisions have been made for our Basins without our knowledge or input. Had we been aware of our inclusion in the ESPAM, we would have certainly had a representative there to protect our interests.

The contribution of the Big and Little Lost Rivers (Basins 34 & 33) to the ESPA is negligible, at best. "Good" water years, (when calls are unlikely) are the only times that these 2 basins may contribute to the ESPA. "Bad" water years, (when calls are likely) do not allow any water to leave these basins.

The ESPAM was never intended to be used as an administrative tool nor as a boundary. Again, the boundaries of the ESPAM seem arbitrary & political. The Big & Little Wood River Valleys should be included in the ESPAM and are not. Do they have representation on the Modeling Committee?

We are told that there is ground water that leaves Basins 33 & 34 and flows into the ESPA, but how much & how long it takes to reach the Twin Falls area are unknowns. Estimates are inexact.

The hydrologic basis for the definition of the Area of Common Ground Water Supply is set forth in the Conjunctive Management Rules as: "The Eastern Snake Plain Aquifer supplies water to and receives water from the Snake River" (CMR 050.0 1.a). The Big & Little Lost River Basins cannot receive water from the Snake River. We do not meet this criterion. If we do become part of the ESPA and are made subject to calls from the Twin Falls area, do we get to make calls ourselves? How will those be delivered?

For the above mentioned reasons, IDWR should not include Basins 33 & 34 in the change to Rule #50 proposed by Clear Springs Foods, Inc.

Sincerely,

Norman G. Allen