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March 7, 2016

**VIA EMAIL & U.S. MAIL**

Director Gary Spackman  
Idaho Dept. of Water Resources  
322 E. Front St.  
Boise, Idaho 83720-0098

**Re: 2016 Conjunctive Administration (Step 1 Methodology Order)**

Dear Director Spackman:

We are writing on behalf of our clients A&B Irrigation District, Burley Irrigation District, Milner Irrigation District, North Side Canal Company, and Twin Falls Canal Company in response to your February 8, 2016 letter concerning Step 1 of the Third Amended Methodology Order.

With respect to the Step 1 requirement to confirm irrigated acreage for the year, our clients adopt and resubmit the letter that was delivered to you for purposes of 2014 administration.<sup>1</sup> As noted in that letter, all of our clients' decreed natural flow water rights identify the number of authorized acres to irrigate within their respective project boundaries. Accordingly, the Director is required to use the elements of the partial decrees for purposes of water right administration. I.C. §§ 42-607; 1417.

Moreover, all clients have confirmed that the expected irrigated area within each project this year has not varied by more than 5% from the existing information (electronic shape files) that have been submitted to you in prior years.

The number of irrigated acres identified by existing shape files on file with the SRBA Court or as submitted to you in prior years is as follows: A&B – 15,924; BID – 46,083; Milner – 13,335; NSCC – 154,067; TFCC – 194,778.

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<sup>1</sup> Step 1 did not change for purposes of the various methodology orders.

Director Gary Spackman  
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If you have any questions please contact me at (208) 733-0700.

Sincerely,

BARKER ROSHOLT & SIMPSON LLP

A handwritten signature in black ink, appearing to read 'T. Thompson', with a long horizontal flourish extending to the right.

Travis L. Thompson

Enc.

cc: Managers (clients)