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ATTORNEYS FOR CITY OF POCATELLO

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MINIDOKA

CITIES OF BLISS, BURLEY, CAREY, DECLO, DIETRICH, GOODING, HAZELTON, HEYBURN, JEROME, PAUL, RICHFIELD, RUPERT, SHOSHONE, and WENDELL, Petitioners, vs. GARY SPACKMAN in his capacity as Director of the Idaho Department of Water Resources, and THE IDAHO DEPARTMENT OF WATER RESOURCES, Respondents.	Case No. CV-2015-172 **AFFIDAVIT OF ADELHEID ("HEIDI") M. WELSH IN SUPPORT OF AIC MOTION FOR AMICUS**
IN THE MATTER OF THE COALITION OF CITIES' SECOND MITIGATION PLAN FOR THE DISTRIBUTION OF WATER TO WATER RIGHT NOS. 36-15501, 36-02551, AND 36-07694 HELD BY RANGEN, INC.	

I, Adelheid ("Heidi") M. Welsh do hereby swear and affirm:

1. I am over 21 and hold B.S. degree in watershed science from Colorado State University.

2. I am employed by Spronk Water Engineers.

3. I oversaw the preparation of Exhibits 1 and 2 attached to this Affidavit.

4. These exhibits reflect the AIC members within the ESPA and a subset of AIC members that hold partial decrees for groundwater rights in the ESPA. AIC members within the ESPA also have licenses for junior ground water rights in the ESPA.

5. Exhibits 1 and 2 were created by comparing the list of partial decrees attached to the Final SRBA Unified Decree, obtained from the SRBA website, with a list of Association of Idaho Cities members.

FURTHER AFFIANT SAYETH NAUGHT.

Respectfully submitted this 13th day of April, 2015.

STATE OF Colorado)
) ss.
COUNTY OF Denver)

I, Adelheid Welsh, state under oath that I have read this foregoing document and verify its content.

Adelheid Welsh

My Commission Expires: 3.10.2019

SANDY ROBERTS
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID # 20034008248
MY COMMISSION EXPIRES MARCH 10, 2019

Sandy Roberts
Notary Public
511 16th Street, Suite #500
Denver, CO 80202

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of April, 2015, I caused to be served a true and correct copy of the foregoing **AFFIDAVIT OF ADELHEID ("HEIDI") M. WELSH IN SUPPORT OF AIC MOTION FOR AMICUS** in **CV-2015-172** upon the following by the method indicated:

Sarah Klahn, White & Jankowski, LLP

Original to: SRBA District Court 253 3rd Ave North P.O. Box 2707 Twin Falls ID 83303-2707	_____ U.S. Mail, Postage Prepaid _____ Hand Delivery _X_ Federal Express 208-736-3011 _____ Facsimile 208-736-2121 _____ Email
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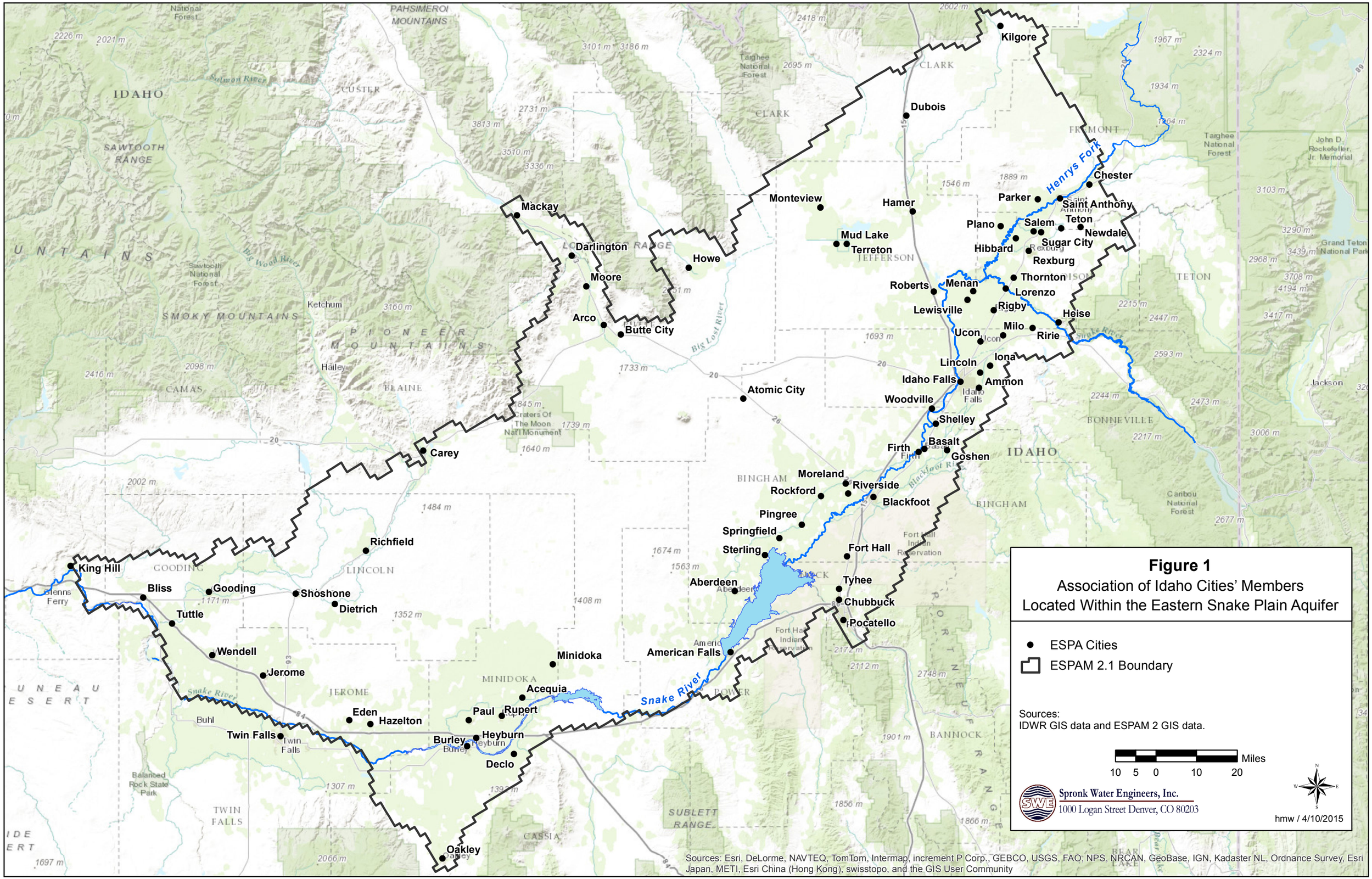

Figure 1
Association of Idaho Cities' Members
Located Within the Eastern Snake Plain Aquifer

● ESPA Cities
ESPAM 2.1 Boundary

Sources:
IDWR GIS data and ESPAM 2 GIS data.

Miles
10 5 0 10 20

Spronk Water Engineers, Inc.
1000 Logan Street Denver, CO 80203

hmw / 4/10/2015

EXHIBIT 1

Table 1
Association of Idaho Cities' Members
With SRBA Partial Decrees for ESPA Ground Water Rights [1]

City Name	City within ESPAM Model Boundary (Y/N)	ESPA Ground Water Rights Junior to 07/01/1957 (Y/N)	ESPA Ground Water Rights Junior to 07/13/1962 (Y/N)
CITY OF ABERDEEN	Y	Y	Y
CITY OF AMERICAN FALLS	Y	Y	Y
CITY OF AMMON	Y	Y	Y
CITY OF ARCO	Y	Y	Y
CITY OF ATOMIC CITY	Y	Y	Y
CITY OF BASALT	Y	Y	Y
CITY OF BLACKFOOT	Y	Y	Y
CITY OF BLISS	Y	Y	Y
CITY OF BURLEY	Y	Y	Y
CITY OF BUTTE CITY	Y	Y	Y
CITY OF CAREY	Y	Y	Y
CITY OF CHUBBUCK	Y	Y	Y
CITY OF DECLO	Y	Y	Y
CITY OF DIETRICH	Y	Y	Y
CITY OF DUBOIS	Y	Y	Y
CITY OF FIRTH	Y	Y	Y
CITY OF GOODING	Y	Y	Y
CITY OF HAZELTON	Y	Y	Y
CITY OF IDAHO FALLS	Y	Y	Y
CITY OF IONA	Y	Y	Y
CITY OF JEROME	Y	Y	Y
CITY OF LEWISVILLE	Y	Y	Y
CITY OF MACKAY	Y	Y	Y
CITY OF MUD LAKE	Y	Y	Y
CITY OF NEWDALE	Y	Y	Y
CITY OF OAKLEY	Y	Y	Y
CITY OF PAUL	Y	Y	Y
CITY OF POCATELLO	Y	Y	Y
CITY OF REXBURG	Y	Y	Y
CITY OF RICHFIELD	Y	Y	Y
CITY OF RIGBY	Y	Y	Y
CITY OF RIRIE	Y	Y	Y
CITY OF ROBERTS	Y	Y	Y
CITY OF RUPERT	Y	Y	Y
CITY OF SHELLEY	Y	Y	Y
CITY OF SHOSHONE	Y	Y	Y
CITY OF ST ANTHONY	Y	Y	Y
CITY OF SUGAR CITY	Y	Y	Y

EXHIBIT 2

Table 1
Association of Idaho Cities' Members
With SRBA Partial Decrees for ESPA Ground Water Rights [1]

City Name	City within ESPAM Model Boundary (Y/N)	ESPA Ground Water Rights Junior to 07/01/1957 (Y/N)	ESPA Ground Water Rights Junior to 07/13/1962 (Y/N)
CITY OF TETON	Y	Y	Y
CITY OF TWIN FALLS	*N*	Y	Y
CITY OF UCON	Y	Y	Y
CITY OF WENDELL	Y	Y	Y
CITY OF EDEN	Y	*N*	*N*
CITY OF HEYBURN	Y	*N*	*N*
CITY OF MENAN	Y	*N*	*N*
CITY OF MINIDOKA	Y	*N*	*N*

[1] The Cities on this list, including Heyburn, also have licenses obtained after 1987 which are also susceptible to curtailment in a delivery call.

The Cities on this list are derived from a comparison of the AIC membership list against the list of partial decree-holders in the Final Unified SRBA Decree.