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ATTORNEYS FOR IDAHO GROUND WATER APPROPRIATORS

BEFORE DEPARTMENT OF WATER RESOURCES

STATE OF IDAHO

IN THE MATTER OF THE
PETITION FOR DELIVERY CALL
OF A&B IRRIGATION DISTRICT
FOR THE DELIVERY OF GROUND
WATER AND FOR THE CREATION
OF A GROUND WATER
MANAGEMENT AREA

Docket No.: 37-03-11-1

IGWA'S FIRST SET OF
INTERROGATORIES AND SECOND
REQUEST FOR PRODUCTION

TO: A & B IRRIGATION DISTRICT.

COME NOW, Idaho Ground Water Appropriators, Inc. Aberdeen American Falls
Ground Water District, Bingham Ground Water District, Bonneville-Jefferson Ground Water
District, Clark Jefferson Ground Water District, Madison Ground Water District, Magic Valley
Ground Water District, and North Snake Ground Water District (collectively "IGWA"), by and
through counsel, pursuant IDAPA 37.01.01 Rules 521 and 522 of the Rules of Practice and
Procedure of IDWR, and the Order Authorizing Interrogatories and hereby submit the following
Interrogatories and Second Request for Production to A & B Irrigation District. These discovery

IGWA'S FIRST SET OF INTERROGATORIES AND SECOND REQUEST FOR PRODUCTION -1

requests are continuing so as to require supplemental answers as additional information becomes known.

DEFINITIONS

For purposes of this First Set of Interrogatories and Second Request for Production, these definitions apply to the following interrogatories and requests.

WELL SYSTEM: A system of one or more wells providing water to a given area. A & B labels these well systems with letters and numbers that describe the system's location and number of wells. For example, well system 26AB821 is located in Section 26 in Township 8 South, Range 21 East and has two wells (Well A and Well B). A & B may also refer to these as Pump Systems.

WELL SYSTEM AREA: one or more fields serviced by a well system.

IRRIGATION SYSTEM: the actual irrigation delivery system to a crop, e.g., center pivot, wheel lines, hand lines, furrows, etc.

INTERROGATORIES

INTERROGATORY NO. 1: Please describe in a narrative format normal well and pump operations for each well system.

INTERROGATORY NO. 2: Please provide system discharge pressure data for each well system, including a description of how and when the discharge may be throttled, for any reason, including but not limited to reduction of deliveries during lower demand periods or to prevent water levels from dropping and causing pump damage.

INTERROGATORY NO. 3: For all well systems please provide the acreage originally irrigated by each system, the years in which changes in acreage or any other changes occurred for each system described above and the acreage currently irrigated by each well system.

INTERROGATORY NO. 4: Please identify any well systems that are sharing laterals, pipelines, and/or drains and identify the acreage associated with such laterals, pipelines and/or drains. Also, please identify which lands receive water from more than one well system.

INTERROGATORY NO. 5: Please identify those well systems for which peak crop requirements have not been met, including when the peak crop requirements were not met and for how long.

INTERROGATORY NO. 6: Please describe and quantify specific cropping changes as a result of inadequate water deliveries and identify the locations where the cropping changes occurred.

INTERROGATORY NO. 7: Please provide a description and quantification of return flows, tailwater flows, and/or drain flows from individual well systems. Please also provide a description and quantification of conveyance losses and the variability in conveyance losses between well systems.

INTERROGATORY NO. 8: Please provide delivery rates for all well systems providing more than 0.75 inches per acre. Also please describe and provide the design application rates for the irrigation systems within the well systems delivering less than 0.75 inches per acre.

- a. For each irrigation system, what is the irrigation application rate?
- b. For each irrigation system, what is the design discharge flow rate?
- c. For each irrigation system, identify and quantify the acres served by center pivot irrigation systems, specifically, those experiencing less than 0.75 inch per acre deliveries.

INTERROGATORY NO. 9: Please identify and describe what a reasonable pumping level or lift would be for A & B Irrigation District's wells and why that level is considered reasonable by A & B Irrigation District..

INTERROGATORY NO. 10: Do you contend that the water rights of A & B Irrigation District were materially injured, injured or adversely impacted as a result of ground water pumping in any year from 1994 to 2007? If your answer is yes, for each year identified please provide the following information:

- a. Please describe precisely and in detail any rotation, efficiency or other conservation practices employed to mitigate such injury or impact.
- b. The number of acres dried up or fallowed, how the acres were determined, where they are located in your service area, and how and when the decision was made.
- c. A complete description of all crop losses or yield reductions, number of acres and types of crops so affected, the estimated value and how it was calculated.

INTERROGATORY NO. 11: Do you contend that ground water pumpers in the Eastern Snake Plain Aquifer should be curtailed in response to A & B Irrigation District's delivery call for the years 1994 to 2007 or future years? If your answer is yes, please provide the following for each year you contend ground water pumpers should be curtailed:

- a. The number of acres that should have been or should be curtailed;
- b. The location of the curtailment area;
- c. The priority dates for curtailment;
- d. When each curtailment should begin and end;
- e. Any other terms or conditions of curtailment you are requesting.

INTERROGATORY NO. 12: Do you contend that ground water pumpers in the Eastern Snake Plain Aquifer should be curtailed in order to provide A & B Irrigation District with carryover storage in the Snake River Reservoir system for the years 1994 to 2007 and any future years? If your answer is yes, please provide the following for each year you contend that ground water pumpers should be curtailed to provide carryover storage;

- a. The quantity of carryover in acre feet;
- b. When the carryover amount should be provided;
- c. The reservoir in which the carryover should be established;
- d. Any other terms or conditions you request be imposed upon ground water

pumpers with respect to such carryover requirement.

INTERROGATORY NO. 13: Please describe each point of discharge on your water delivery system beyond which water is not recaptured or used for irrigation purposes.

Specifically, please provide:

- a. The location and common name for each point of discharge;
- b. The type of measuring device and when it was installed;
- c. The type and location of the records maintained which quantify the

amount of discharge;

- d. The cumulative amount of discharge in acre feet from all discharge points for each year that you have records.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and data referred to or relied upon in your answers to the foregoing interrogatories and identify to which interrogatory(ies) it relates.

DATED this 27th day of January, 2008.

RACINE OLSON NYE BUDGE
& BAILEY, CHARTERED



CANDICE M. MCHUGH
Attorneys for Idaho Ground Water Appropriators

CERTIFICATE OF MAILING

I hereby certify that on this 2nd day of January, 2008, the above and foregoing, was sent to the following by U.S. Mail proper postage prepaid and by email for those with listed email addresses:


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