

RECEIVED

MAR 10 2005

DEPARTMENT OF  
WATER RESOURCES

Jeffrey C. Fereday (Idaho State Bar # 2719)  
Michael C. Creamer (Idaho State Bar # 4030)  
Deborah E. Nelson (Idaho State Bar # 5711)  
GIVENS PURSLEY LLP  
601 Bannock Street, Suite 200  
P.O. Box 2720  
Boise, ID 83701-2720  
Telephone: (208) 388-1200  
Facsimile: (208) 388-1300

*Attorneys for Idaho Ground Water Appropriators, Inc.*

**BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO**

IN THE MATTER OF GROUND WATER  
DISTRICTS' APPLICATION FOR  
APPROVAL OF MITIGATION PLAN FOR  
THE AMERICAN FALLS REACH OF THE  
SNAKE RIVER

**GROUND WATER DISTRICTS'  
MOTION FOR ORDER AUTHORIZING  
DISCOVERY**

The American Falls-Aberdeen Ground Water District, Bingham Ground Water District, Bonneville-Jefferson Ground Water District, Madison Ground Water District, South West Irrigation District, North Snake Ground Water District, and Magic Valley Ground Water District, collectively the "Applicants" or the "Districts" through their attorneys Givens Pursley LLP, pursuant to Department Rule 521, hereby move for an order of the Department authorizing the Districts to engage in discovery by all methods authorized by the Department's rules and the Idaho Rules of Civil Procedure. Specifically, Applicants foresee a likely need to subpoena witnesses to appear at the hearing in this matter. The Districts further request that such order establish an expedited schedule for conducting discovery.

DATED this 10<sup>th</sup> day of March 2005.

GIVENS PURSLEY LLP

By:   
Michael C. Creamer  
Attorneys for Applicants

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of March 2005, I served a true and correct copy of the foregoing by delivering the same to each of the following individuals by the method indicated below, addressed as follows:

Mr. Karl J. Dreher  
Director  
Idaho Department of Water Resources  
322 East Front Street  
P.O. Box 83720  
Boise, ID 83720-0098

U.S. Mail  
 Facsimile  
 Overnight Mail  
 Hand Delivery

  
Michael C. Creamer