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Attorneys for South Valley Ground Water District

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

CV07-21-00243

IN THE MATTER OF BASIN 37
ADMINISTRATIVE PROCEEDING

Docket No. AA-WRA-2021-001

**DECLARATION OF SVGWD
CHARIMAN KRISTY MOLYNEUX
IN SUPPORT OF
PETITION FOR JUDICIAL
REVIEW, COMPLAINT FOR
DECLARATORY RELIEF,
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION, OR
ALTERNATIVELY, WRIT OF
PROHIBITION**

I, Kristy Molyneux, hereby declare and state as follows:

1. I am over the age of 18 and state the following based upon my own personal knowledge.
2. I am the Chairman of the South Valley Ground Water District (“SVGWD”). In that capacity, I am familiar with all operations of SVGWD, including operations of its various members. I am also a farmer. I have been farming for 40 years and own 1,100

acres in Blaine County, all of which is irrigated and lies within the SVGWD boundary.

I raise primarily grain and alfalfa on my land.

3. SVGWD is made up of approximately 100 members with approximately 200 wells that supply ground water for the irrigation of roughly 29,400 irrigated acres with a total authorized diversion rate of approximately 379 c/f/s (cubic feet per second).
4. I am familiar with the May 4, 2021 *Notice of Administrative Proceeding, Pre-Hearing Conference, and Hearing* (“*Notice*”) from the Idaho Department of Water Resources, the proposed curtailment of ground water in Basin 37, and the implications it will have on the members of SVGWD.
5. The agricultural lands within SVGWD have all been previously planted for the 2021 season in grain, alfalfa, rye grass, mustard, aspen trees, and seed potatoes, oats cut for forage.
6. Curtailment would result in approximately 12,000 acres of already planted, irrigated agricultural land being left without irrigation water, causing those crops to be lost.
7. Additionally, water would be curtailed for 5,500 acres used for pastureland and livestock.
8. The loss in gross revenue as a result of curtailment would be approximately \$12 million, to just the farmers. This estimate does not include what would result in a significant loss to other businesses and individuals.
9. Based on the forgoing, it is my opinion that the proposed curtailment would result in immediate and irreparable harm and injury to the farms whose water rights would be subject to curtailment.

10. Attached hereto as **Exhibit A** is a map showing location of the boundary of the South Valley Ground Water District.

11. Attached hereto as **Exhibit B** is a list of water rights and holders in SVGWD.

I declare under penalty of perjury under the laws of the State of Idaho that the foregoing is true and correct.

DATED this 24th day of May, 2021.

/s/ Kristy Molyneux
Kristy Molyneux

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of May, 2021, the foregoing was filed, served, and copied as shown below.

IDAHO DEPARTMENT OF WATER RESOURCES
P.O. Box 83720
Boise, ID 83720-0098
Hand delivery or overnight mail:
322 East Front Street
Boise, ID 83702
Fax: (208) 287-6700

- U. S. Mail
- Hand Delivered
- Overnight Mail
- iCourt
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- Hand Delivered
- Overnight Mail
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- E-mail

/s/ Albert P. Barker
Albert P. Barker

Legend

- Roads

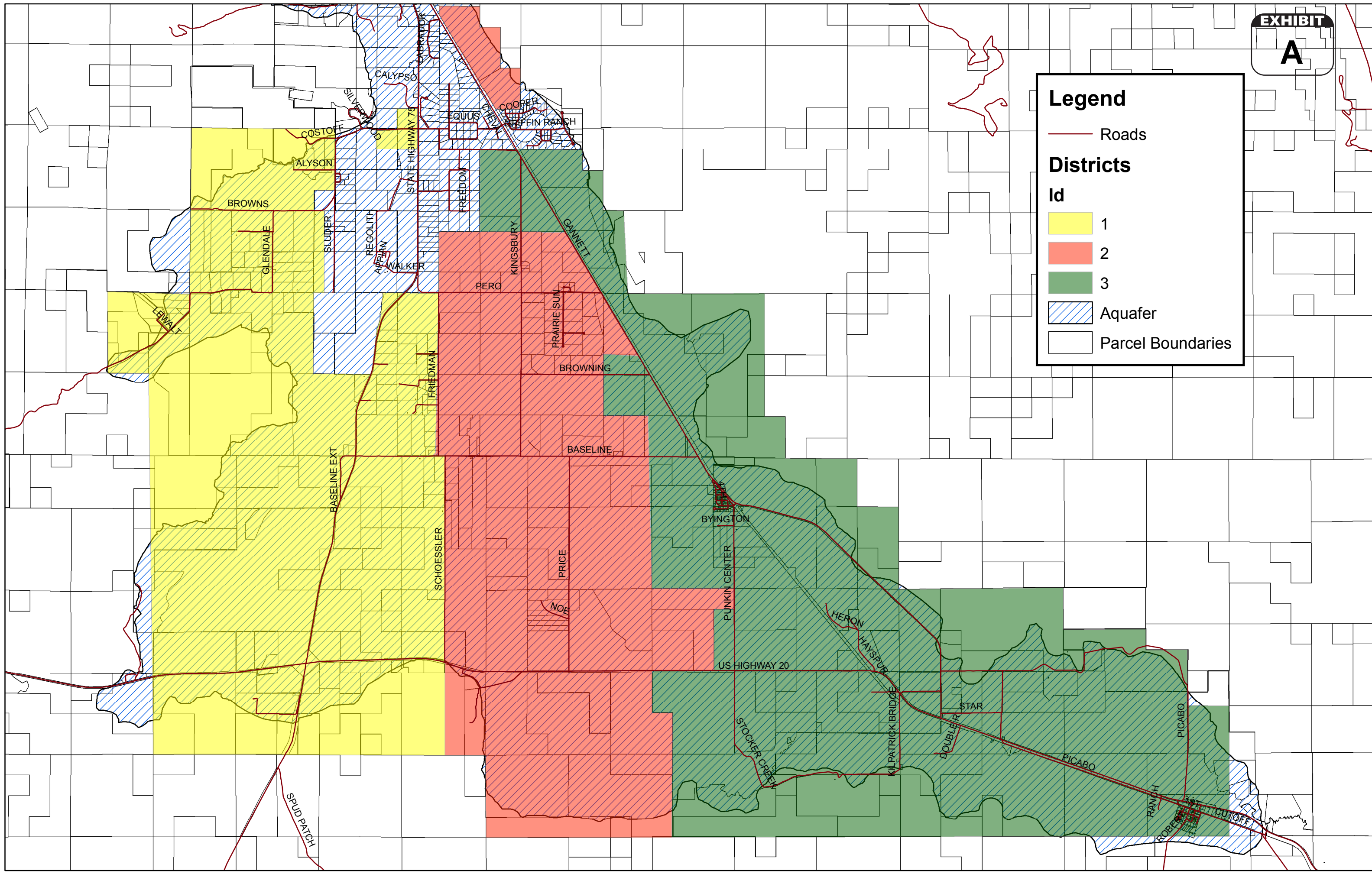
Districts

Id

- 1
- 2
- 3

Aquafer

Parcel Boundaries



OWNER	W. Water Right	Month	Day	Year	AFA	CFS	Annual Pur	Annual pur	CFS combir	Total dom	Total CFS	CFS < .5
ANDERSON	37-22360		1	29	1965	378.9		2.53	2.53		2.53	
BAIRD, CA	37-8408		10	6	1988	7		0.06	0.06			0.06
AUBREY SP	37-2686D		12	11	1962	66.5		0.16	0.16			0.44
AUBREY SP	37-7598D		7	8	1977	66.5		0.22	0.22			
AUBREY SP	37-22778		12	5	1979	8.4		0.06	0.06			
AUBREY SP	37-22777		12	5	1979	556.2		3.18	3.18		5.46	
AUBREY SP	37-2553A		6	28	1954	350		2	2			
AUBREY SP	37-8571		9	22	1989	1983.5		5	5			
BECK, THO	37-2732		4	11	1966	339.5		1.9	1.9		1.9	
BELLE RAN	37-2630		2	2	1960	1011.5		3.65	3.75		4.7	
STEVENSOI	37-22737		10	28	1974	18		0.12	0.12			
STEVENSOI	37-22739		9	20	1977	21		0.13	0.13			
STEVENSOI	37-22741		10	18	1980	3		0.02	0.02			
BELLE RAN	37-23055		8	12	1961	75.3		0.43	0.43			
STEVENSOI	37-22737							0.12	0.12			
STEVENSOI	37-22739							0.13	0.13			
BLACKBUR	37-23090		11	13	1959	1256.8		7.16	7.16		22.35	
BLACKBUR	37-23092							8.89	8.89			
BLACKBUR	37-2625B							0.04	0.04			
BLACKBURN FARMS III LP												
BLACKBURN FARMS III LP												
BLACKBUR	37-23093							2.65	2.65			
BLACKBUR	37-23091							3.61	3.61			
BLAINE CO	37-21569							0.02	0.02			0.02
BOND, HEL	37-20619							0.11	0.11			0.19
BOND, HEL	37-20621							0.17	0.17			
MC INNIS,	37-7775C							0.4	0.4			0.4
BORDENKII	37-8011A							0.06	0.06			0.06
ABJ2 LLC; S	37-2668							1.54	1.11		9.33	
ABJ2 LLC; S	37-2631							5.72	5.72			
ABJ2 LLC; S	37-2664A							2.5	2.5			
ABJ2 LLC; S	37-19735											
BECK, WILL	37-2559B							0.18	0.18			0.18
BECK, WILL	37-20737							0.03	0.03			
CAMERON,	37-7243							0.22	0.18	0.04	0.5	
CAMERON,	37-7995							0.32	0.32			
CAMERON,	37-7373							0.24	0.2	0.04		0.2
CASEY, MA	37-21500							0.05	0.05			0.05
CEMMRM	37-2739							1.23	1.2	0.03	1.2	
CHANEY CF	37-2609A							0.48	0.48		6.92	
CHANEY CF	37-2685							2.46	2.46			
CHANEY CF	37-7284							1.98	1.98			
CHANEY CF	37-2608							2	2			
DE CHEVRI	37-8553							0.09	0.09			0.09
DIGES, ANI	37-20826							0.15	0.15			0.3
DIGES, ANI	37-20828							0.25	0.25			
DILWORTH	37-7775G							0.4	0.4			0.4
DREYER, R(37-2614							2	2		2.29	
DREYER, R(37-14289							0.29	0.29			
GARST, Da'	37-20928							1.46	1.38		1.38	
GARST, Da'	37-21807							3.08	3.08		3.08	
EMERALD /	37-2611C							1.11	1.11		1.11	
FARNWOR	37-2546A							0.32	0.32			0.16
FLOLO, JOF	37-2611D							0.12	0.12			0.12
FLOOD, JOI	37-2479							5.88	5.88		10.46	
FLOOD, JOI	37-7676							0.4				
FLOOD, JOI	37-21568							0.56	0.56			
FLOOD, JOI	37-2573							1.42	1.42			
FLOOD, JOI	37-11932							0.72				

FLOOD, JOI 37-7014	2.6	2.6			
FOLEY, CH/ 37-22453	3.33	3.33		4.19	
FOLEY, CH/ 37-8225A	0.36	0.36			
FOLEY, CH/ 37-2686E	0.21	0.21			
FOLEY, CH/ 37-7598E	0.29	0.29			
C W & R H 37-4433	2.86	2.86		2.86	
C W & R H 37-21974	5.76	5.76		5.76	
C W & R H 37-8218	1	1		13.2	
C W & R H 37-2684	6.4	6.4			
C W & R H 37-802	5	5.8			
C W & R H 37-8219	4.5				
GARNER, N 37-7775D	0.4	0.4			0.4
GIRTON, RA 37-22692	0.03	0.03			0.12
GIRTON, RA 37-22693	0.03	0.03			
GIRTON, RA 37-22695	0.03	0.03			
GIRTON, RA 37-22696	0.03	0.03			
WHEELER C 37-7616	0.18	0.14	0.04		0.14
O CROWLE 37-4194	0.04	0.04			0.01
GOVE, JAY; 37-7064D	0.36	0.36			0.36
GREEN, LAI 37-2705B	0.78	0.78		0.78	
APPLEGATI 37-22390	0.05	0.05			0.05
HARRIS, M 37-7609	0.295				0.295
WICKED G/ 37-7609	0.295			2.035	
WICKED G/ 37-7609	0.295				
WICKED G/ 37-7609	0.55				
WICKED G/ 37-7609	0.295				
WICKED G/ 37-7609	0.295				
WICKED G/ 37-7609	0.295				
HARRISON 37-22874	0.4	0.4			0.4
HAYWARD 37-4160	0.19	0.16	0.03		0.16
HEART RO(37-22050	3.1	3.06	0.04	11.34	
HEART RO(37-2492	2.75	2.75			
HEART RO(37-22749	0.62	0.62			
HEART RO(37-2538	1.65	1.65			
HEART RO(37-2597	1.36	1.32	0.04		
HEART RO(37-2764	1.98	1.94	0.04		
HEMINGW 37-7349B	0.43	0.43		1.55	
HEMINGW 37-2683B	1.12	1.12			
HENEGHA I 37-8168	0.09	0.07	0.02		0.11
HENEGHA I 37-8488	0.04	0.04			
HENSON, E 37-22361	0.04	0.04			0.04
O CROWLE 37-4194	0.005	0.005			0.005
STRUTHER: 37-2593	1.45	0.05			0.05
SMITH, GA 37-21496	0.05	0.05			0.05
IVERSON, C 37-20929	0.08	0.08			0.08
JASKOWSK 37-21459	0.4	0.4			0.4
JOHN D & I 37-21175	0.4	0.4			0.4
JORGENSE I 37-7775F	0.4	0.4			0.4
KELLER, JAS 37-20413	0.4	0.4			0.4
KIMBALL, I 37-7409	0.19	0.19			0.19
LAKESIDE I 37-2747	1.06	1.06		13.65	
LAKESIDE I 37-7002	3.93	3.93			
LAKESIDE I 37-7309					
LAKESIDE I 37-12089					
LAKESIDE I 37-7225	4.62	4.62			
LAKESIDE I 37-8559	1.15	1.15			
LAKESIDE I 37-2493	2	2			
LAKESIDE I 37-7210	0.89	0.89			
LOGAN, BE 37-20895	0.35	0.35			0.35
LOOMIS, N 37-4336	0.28	0.28			0.28
LOVAS TRL 37-2625A	0.8	2.2		2.2	

LOVAS TRL 37-21463	0.3			
LOVAS TRL 37-2638	0.4			
LOVAS TRL 37-2700	0.99			
LUNCEFOR 37-2664B	0.6	0.6	0.6	
O CROWLE 37-4194	0.01	0.01		0.005
MADSEN, F 37-21604	0.26	0.26		0.26
MARKS, M. 37-20805	0.08	0.08		0.08
ASI LLLP 37-7893A	0.23	0.23		0.23
PHELPS, SF 37-2624B	0.44	0.44		0.44
MC GOWA 37-22571	0.2	0.2		0.2
MOLYNEU) 37-8068	1.04	1.04	4.4	
MOLYNEU) 37-2629	2.5	2.5		
MOLYNEU) 37-7584	0.86	0.86		
MOLYNEU) 37-2570	1.75	1.75	2.05	
MOLYNEU) 37-11426	0.3	0.3		
MOLYNEU) 37-2658	9.24	9.24	11.18	
MOLYNEU) 37-4421B				
MOLYNEU) 37-11387	1.94	1.94		
MOLYNEU) 37-7651				
MOLYNEU) 37-11430				
MOUNTAIN 37-22697	0.06	0.06		0.06
NACHTMA 37-20704	0.07	0.07		0.07
THE NATUI 37-2609C	2.02	2.02	4.03	
THE NATUI 37-2580	2.01	2.01		
NISSON, JE 37-2496	2.36	2.36	2.36	
STEVEN SP 37-804	1.82	0.82	16.44	
SPETH, STE 37-20635	8.88	4		
SPETH, STE 37-20637	1.58	0.71		
SPETH, STE 37-20639	2.45	1.1		
SPETH, STE 37-2502	5	2.25		
SPETH, STE 37-2581	3	1.35		
SPETH, STE 37-7758	3.5	1.58		
SPETH, STE 37-2616	2.98	1.34		
SPETH, STE 37-2604	2.5	1.13		
SPETH, STE 37-2568	3.2	1.44		
SPETH, STE 37-8116	0.03	0.01		
SPETH, STE 37-7663	0.1	0.04	0.08	
SPETH, STE 37-2599	1.5	0.68		
Price Place 37-804	1.82	1	20.1	
Price Place 37-20635	8.88	4.88		
Price Place 37-20637	1.58	0.87		
Price Place 37-20639	2.45	1.35		
STEVENSOI 37-2502	5	2.75		
Price Place 37-2581	3	1.65		
STEVENSOI 37-7758	3.5	1.93		
STEVENSOI 37-2616	2.98	1.64		
STEVENSOI 37-2604	2.5	1.38		
STEVENSOI 37-2568	3.2	1.76		
STEVENSOI 37-8116	0.03	0.02		
Price Place 37-7663	0.1	0.06	0.08	
Price Place 37-2599	1.5	0.83		
WEBB LAN 37-22328	0.12	0.12		0.12
PICABO LIV 37-2627A	16.83	16.83	16.83	
PICABO LIV 37-11911				
PICABO LIV 37-11914				
BASHAW F 37-2594A	0.07	0.07	20.15	
THE BRETT 37-2683A	1.88	1.88		
THE BRETT 37-7349A	1.17	1.17		
BASHAW F 37-2612A	0.07	0.07		
BASHAW F 37-7239A	0.04	0.04		
BASHAW F 37-2566A	0.07	0.07		

BASHAW F 37-22563	3.07	3.07		
BASHAW F 37-2615	1.8	1.8		
BASHAW F 37-22561	2.32	2.32		
BASHAW F 37-22565	1.55	1.55		
BASHAW F 37-22559	2.86	2.86		
BASHAW F 37-22560	0.11	0.11		
BASHAW F 37-22562	0.09	0.09		
BASHAW F 37-22564	0.11	0.11		
BASHAW F 37-22566	0.06	0.06		
BASHAW, / 37-800	2	2		
BASHAW, / 37-801	2	2		
BASHAW, (37-22389	0.52	0.52		
BASHAW, (37-22587	0.13	0.13		
BASHAW, (37-22572	0.23	0.23		
POINT OF F 37-4427	1	1	2.54	
POINT OF F 37-2591	1.54	1.54		
PRAIRIE SU 37-21046	5.99	5.99	7.25	
PRAIRIE SU 37-21050	0.35	0.35		
PRAIRIE SU 37-21084	0.86	0.86		
PRAIRIE SU 37-21088	0.05	0.05		
O CROWLE 37-4194	0.01	0.01		0.01
BAKER, JER 37-20822	0.25	0.3		0.3
BAKER, JER 37-20824	0.15			
RENEGADE 37-2444	2.52	2.52	5.32	
RENEGADE 37-7551	2.8	2.8		
ROGERS IN 37-2643	3.4	3.4	24.38	
ROGERS IN 37-2661	2.32	2.32		
ROGERS IN 37-2642	3	3		
ROGERS IN 37-2600	0.72	0.72		
ROGERS IN 37-2662B	1.32	1.32		
ROGERS IN 37-2662A	2.1	2.1		
ROGERS IN 37-2641A	4.07	4.07		
ROGERS IN 37-2641B	0.93	0.93		
ROGERS IN 37-4289A	0.16	0.16		
ROGERS IN 37-4289B	0.08	0.08		
DEAN R RC 37-7633	4.06	4.06		
DEAN R RC 37-8091	2.22	2.22		
SAMPLE W 37-604E	1.04	0.72	0.72	
SAMPLE, V 37-7775E	0.72			
SANGHA, K 37-22628	0.32	0.32	2.12	
SANGHA, K 37-2518	1.8	1.8		
SCHMID, S 37-22027	0.06	0.06	1.11	
SCHMID, S 37-22029	0.18	0.18		
SCHMID, S 37-22031	0.34	0.34		
SCHMID, S 37-22033	0.11	0.11		
SCHMID, S 37-22035	0.12	0.12		
SCHMID, S 37-22037	0.02	0.02		
SCHMID, S 37-22039	0.04	0.04		
SCHMID, S 37-22041	0.24	0.24		
SCHMIDT, 37-22694	0.03	0.03		0.03
SILVER SAC 37-22586	5.6	5.6	5.6	
SHERBINE, 37-21603	0.46	0.46		0.46
SHERBINE ' 37-21271	0.23	0.23	0.47	
SHERBINE ' 37-21273	0.4	0.4		
SHERBINE ' 37-2682	3.44	3.44	3.67	
SHERBINE ' 37-21272	0.23	0.23	0.47	
SHERBINE ' 37-21274	0.4	0.4		
SHERBINE ' 37-2554	3.2	3.2	4.52	
SHERBINE ' 37-4114	1.4	1.4		
SHERBINE ' 37-22016	0.94	0.94		
SHERBINE, 37-2561	3.82	3.82	3.82	

SHERBINE, 37-2582	2.8	2.8		1.4	
SKY LLC 37-7838B	0.08	0.08			0.13
SKY LLC 37-7113B	0.05	0.05			
SLUDER, C 37-8476	0.18	0.08	1		0.08
BLACKBUR 37-20896	0.35	0.35			0.35
SMITH, GEI 37-4159	0.32	0.32		2.1	
SMITH, GEI 37-20629	0.34	0.34			
SMITH, GEI 37-2552	1.44	1.44			
O CROWLE 37-4194	0.01	0.01			0.01
SPRINGS RI 37-7812	1.26	1.26		1.26	
STALKER CI 37-2609B	1.41	1.41		6.84	
STALKER CI 37-2618	2.39	2.39			
STALKER CI 37-7800	3.75	3.75			
STASZ, MA 37-14290	0.22	0.22			0.22
STEVENSOI 37-8003	3.79	3.79		3.79	
STEVENSOI 37-7020					
STEVENSOI 37-22738	11.81	11.81		32.78	
STEVENSOI 37-22740					
STEVENSOI 37-7645					
STEVENSOI 37-2656					
STEVENSOI 37-22736	4.78	4.78			
STEVENSOI 37-8117					
STEVENSOI 37-8196					
STEVENSOI 37-2576	4.69	4.69			
STEVENSOI 37-2681	4.5	4.5			
STEVENSOI 37-2649A	2.16	2.16			
STEVENSOI 37-2649B	1.64	1.64			
STEVENSOI 37-7644	1.04	1.04			
BELLE RAN 37-4133	2.12	2.12		2.12	
SYRINGA R 37-4362	0.08	0.04	0.04		0.08
TEDESCO, J 37-20494	1.1	1.1		1.1	
THREE CRE 37-7811	3.36	3.36		3.36	
TRASK, TEF 37-8011B	0.1	0.1			0.1
FARNWOR 37-2546A	0.32	0.32			0.32
ARGUEDA S 37-7064E	0.46	0.46			0.46
WAGNER, I 37-22655	0.27	0.25	0.02		0.25
WALBERT, 37-8536	1.85	1.85		1.85	
WEEMS, M 37-7452	0.22	0.18	0.04		0.18
5Bison LLC 37-21474	0.87	0.87		0.87	
FERY LC RA 37-7799	2.78	2.72	0.06	2.72	
FERY LC RA 37-2686C	1.62	1.62		3.92	
FERY LC RA 37-7598C	2.3	2.3			
WOOD RIV 37-2505	1.4	1.4		2.06	
WOOD RIV 37-2546B	0.66	0.66			
Y 3 RANCH 37-7838A	1.5	1.5		1.52	
Y 3 RANCH 37-7113A	1.04	1.04			
Baseline C 37-4109	6	6		6	
Baseline C 37-2556A	6.76	6.76		6.76	
ITD 37-7165	0.11	0.09		0.09	

388.1 371.45 11.81

11.805