

Josephine P. Beeman (ISB # 1806)
Beeman & Associates, P.C.
409 West Jefferson Street
Boise, ID 83702
Phone: 208-331-0950
Fax: 208-331-0954
jo.beeman@beemanlaw.com

RECEIVED

JUL 29 2009

Department of Water Resources
Adjudication Bureau

Attorneys for The Amalgamated Sugar Company LLC

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

	)	Subcase No. 01-00004 (et al.) See Attachment A
	)	
In Re: SRBA	)	THE AMALGAMATED SUGAR CO.'S
	)	RESPONSE TO OBJECTORS' AND GROUND
Case No. 39576	)	WATER DISTRICTS' MOTIONS FOR
	)	SUMMARY JUDGMENT
	)	
_____	)	

The Amalgamated Sugar Company LLC, by and through its attorneys of record, Beeman & Associates, P.C., hereby responds to the following Motions for Summary Judgment:

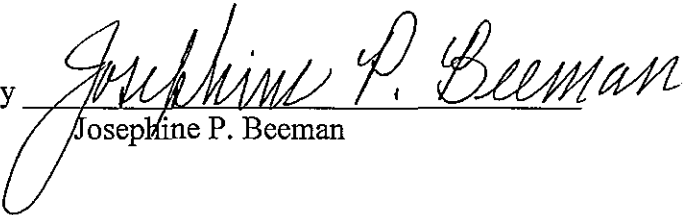
1. June 23, 2009 Motion for Summary Judgment filed by Mud Lake Water Users, Inc., Montevue Canal Co., Independent Water Users of Mud Lake, Producers Irrigation Co., and Jefferson Irrigation District (Objectors).
2. June 23, 2009 Amended Motion for Summary Judgment filed by Aberdeen American Falls Ground Water District, Bingham Ground Water District, Bonneville Jefferson Ground Water District, Jefferson Clark Ground Water District, Madison Ground Water District, Magic Valley Ground Water District, and North Snake Ground Water District (Ground Water Districts).

The Amalgamated Sugar Company LLC is entering into a settlement regarding Water Right 1-10483 which will include language in either the source or priority date element to the effect that 1-10483 will not exercise its 1926 priority date against ground water users tributary to the Snake River above Milner Dam.

DATED this 29th day of July 2009.

BEEMAN & ASSOCIATES, P.C.
Attorney for The Amalgamated Sugar Co., LLC

By


Josephine P. Beeman

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of July 2009, I caused to be served the foregoing document by U.S. Mail on:

CITY OF POCATELLO

Represented by:
A. DEAN TRANMER
CITY OF POCATELLO
PO BOX 4169
POCATELLO, ID 83201
Phone: 208-234-6148

MILNER IRRIGATION DIST

NORTH SIDE CANAL CO LTD
TWIN FALLS CANAL CO
Represented by:
BARKER, ROSHOLT & SIMPSON
113 MAIN AVE W, STE 303
PO BOX 485
TWIN FALLS, ID 83303 0485
Phone: 208-733-0700

AMERICAN FALLS RESERVOIR

Represented by:
C THOMAS ARKOOSH
301 MAIN ST
PO BOX 32
GOODING, ID 83330
Phone: 208-934-8872

AMERICAN FALLS RES

Represented by:
CRAIG D. HOBDEY
125 5TH AVE
PO BOX 176
GOODING, ID 83330
Phone: 208-934-4429

BLACKFOOT IRRIGATION CO

FREMONT-MADISON IRRIG
UNITED CANAL CO
Represented by:
JERRY R. RIGBY
25 N 2ND E
PO BOX 250
REXBURG, ID 83440-0250
Phone: 208-356-3633

STATE OF IDAHO

Represented by:
NATURAL RESOURCES DIV
ATTORNEY GENERAL'S OFFICE
PO BOX 44449
BOISE, ID 83711-4449

ABERDEEN AMERICAN FALLS

BINGHAM GWD
BONNEVILLE JEFFERSON GWD
CAREY VALLEY GWD, IGWA INC
JEFFERSON CLARK GWD
MADISON GWD
MAGIC VALLEY GWD
NORTH SNAKE GWD

Represented by:
RANDALL C BUDGE
201 E CENTER, STE A2
PO BOX 1391
POCATELLO, ID 83204-1391
Phone: 208 232-6101

UNIT A ASSOCIATION

Represented by:
ROBERT A. MAYNARD
PERKINS COIE LLP
1111 W JEFFERSON ST STE 500
PO BOX 737
BOISE, ID 83701-0737
Phone: 208-343-3434

INDEPENDENT WATER USERS

JEFFERSON IRRIGATION DIST
MONTEVIEW CANAL CO
MUD LAKE WATER USERS
PRODUCERS IRRIGATION CO
Represented by:
ROBERT L HARRIS
1000 RIVERWALK DR, STE 200
PO BOX 50130
IDAHO FALLS, ID 83405
Phone: 208-523-0620

A & B IRRIGATION DISTRICT BURLEY IRRIGATION DISTRICT FALLS IRRIGATION DISTRICT

Represented by:
ROGER D LING
615 H ST
PO BOX 396
RUPERT, ID 83350 0396
Phone: 208-436-4717

CITY OF POCATELLO

Represented by:
SARAH A KLAHN
WHITE & JANKOWSKI LLP
511 16TH ST STE 500
DENVER, CO 80202
Phone: 303-595-9441

UNITED STATES OF AM USDI BUREAU OF RECLAM

Represented by:
US DEPT OF JUSTICE
ENVIRONMENT & NATL' RES
550 WEST FORT ST, MSC 033
BOISE, ID 83724

MINIDOKA IRRIGATION DIST

Represented by:
W KENT FLETCHER
1200 OVERLAND AVE
PO BOX 248
BURLEY, ID 83318
Phone: 208-678-3250

SOUTHWEST IRRIGATION D

Represented by:
WILLIAM A. PARSONS
137 W 13TH ST
PO BOX 910
BURLEY, ID 83318
Phone: 208-878-8382

STEVE MUECKE

925 W WANDA LN
HEYBURN, ID 83336

PAUL T. SMITH

PO BOX 1882
TWIN FALLS, ID 83303
Phone: 208-734-2510

DIRECTOR OF IDWR

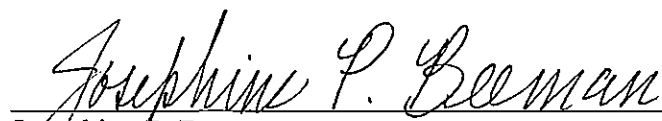
PO BOX 83720
BOISE, ID 83720-0098

UNITED STATES OF AM REGIONAL DIRECTOR PN BUREAU OF RECLAMATION

1150 N CURTIS RD STE 100
BOISE, ID 83706 1234
Phone: 208 378 5322

TIM EILERS

1109 W 300 S
HEYBURN, ID 83336
Phone: 208 438 5118


Josephine P. Beeman

ATTACHMENT A

1-4
1-5
1-6
1-7
1-8
1-9
1-10
1-13
1-14
1-16
1-17
1-23A
1-212
1-213
1-2040
1-2050
1-2060
1-2060A
1-2061
1-4060
1-10034
1-10189
1-10225
1-10237
1-10238
1-10239
1-10240
1-10241
1-10482
1-10483