

RECEIVED

APR 06 2020

DEPARTMENT OF
WATER RESOURCES

CHRIS M. BROMLEY ISB #6530
CANDICE M. MCHUGH ISB #5908
MCHUGH BROMLEY, PLLC
380 South 4th Street, Suite 103
BOISE, ID 83702
Telephone (208) 287-0991
Facsimile (208) 287-0864
Email: cbromley@mchughbromley.com
cmchugh@mchughbromley.com

RECEIVED

APR 10 2020

DEPT OF WATER RESOURCES
SOUTHERN REGION

Attorneys for Sun Valley Company

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

IN RE APPLICATION FOR PERMIT NO.
37-23018

In the Name of South Valley
Ground Water District

NOTICE OF PROTEST

COMES NOW the Sun Valley Company ("Protestant"), by the through its attorneys of record, McHugh Bromley, PLLC, and hereby files this Notice of Protest to Application for Permit No. 37-23018 ("Application"), filed in the name of the South Valley Ground Water District ("Applicant"). The initial bases for the Protest are as follows:

1. The Applicant has not demonstrated that the unappropriated water supply is sufficient for diversion of water under the Application.
2. The Applicant has not explained how the Application will be administered as to existing and future water rights.
3. If there is insufficient water and/or improper administration, the Application will cause injury to water rights.

4. If there is insufficient water and/or improper administration, the Application will conflict with the local public interest, be contrary to the conservation of water resources within the State of Idaho, and adversely affect the local economy of the watershed.
5. This Protest may be resolvable with additional information from Applicant.
6. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

RESPECTFULLY SUBMITTED this 3rd day of April, 2020.

MCHUGH BROMLEY, PLLC



CHRIS M. BROMLEY

Attorneys for Sun Valley Company

CERTIFICATE OF SERVICE

I certify that on this 3rd day of April, 2020, I caused to be served a true and correct copy of the foregoing *Notice of Protest* upon the following persons by the method(s) indicated:

Idaho Department of Water Resources
322 East Front Street
PO Box 83720
Boise, ID 83720-0098

☒ U.S. Mail, Postage Prepaid
☐ Hand Delivered

South Valley Ground Water District
c/o Kristy Molyneux
PO Box 223
Bellevue, ID 83313-0223

☒ U.S. Mail, Postage Prepaid
☐ Hand Delivered

Albert P. Barker
Barker Rosholt & Simpson
PO Box 2139
Boise, ID 83701-2139

☒ U.S. Mail, Postage Prepaid
☐ Hand Delivered


CHRIS M. BROMLEY

FOR OFFICE USE ONLY:

Fees paid: \$50.00 (total) **Date:** 4/6/2020
Receipt No.: C108549 **By:** S.O.

McHUGH BROMLEY
ATTORNEYS AT LAW, PLLC

Candice M. McHugh
cmchugh@mchughbromley.com

380 S. 4th Street, Ste. 103
Boise, Idaho 83702
(208) 287-0991

Chris M. Bromley
cbromley@mchughbromley.com

RECEIVED
APR 06 2020
DEPARTMENT OF
WATER RESOURCES

April 3, 2020

Idaho Dept. of Water Resources
322 E. Front St.
PO Box 83720
Boise, ID 83720-0098

RECEIVED
APR 10 2020
DEPT OF WATER RESOURCES
SOUTHERN REGION

Re: Protests to 37-23018

Dear Clerk:

Please find enclosed two notices of protest as to application for permit no. 37-23018 in the name of South Valley Ground Water District along with an enclosed check for \$50.00. The protests are being filed by the City of Bellevue and the Sun Valley Company. The \$50.00 check is to cover the filing fee for each protest.

Given the current health climate, I am mailing these protests with the hope that they will be received on April 7, 2020. When you receive the protests, if you would please confirm the receipt with a phone call to my office or an email to either Candice or me, I would greatly appreciate it. If I do not hear from you by early afternoon on April 7, someone with our office will come to your office to hand deliver the protests.

Sincerely,



CHRIS M. BROMLEY