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DEPARTMENT OF  
WATER RESOURCES

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APR 10 2020  
DEPT OF WATER RESOURCES  
SOUTHERN REGION

*Attorneys for City of Bellevue*

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

IN RE APPLICATION FOR PERMIT NO.  
37-23018

**NOTICE OF PROTEST**

In the Name of South Valley  
Ground Water District

COMES NOW the City of Bellevue ("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 3<sup>rd</sup> day of April, 2020.

MCHUGH BROMLEY, PLLC



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CHRIS M. BROMLEY

*Attorneys for City of Bellevue*

## CERTIFICATE OF SERVICE

I certify that on this 3<sup>rd</sup> 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

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DEPARTMENT OF  
WATER RESOURCES

April 3, 2020

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

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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