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LAW OFFICES

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Department of Water Resources
Eastern Region

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September 22, 2017

James Cefalo
Idaho Department of Water Resources
Eastern Idaho Regional Office
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718

Re: *Objection to Notice of Change of Water Right Ownership for Water Right Nos. 11-119 and 11-120 Submitted by Laura Widmer.*

Dear James:

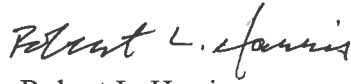
As you know, we represent Widmer Ranch, LLC and its two members, Kirk and Janet Widmer. We understand that Laura Widmer has submitted a *Notice of Change of Water Right Ownership* for Water Right Nos. 11-119 and 11-120, which are commonly known as the "Samuel Widmer Rights". We have previously briefly discussed the issues around the Samuel Widmer Rights.

We request, through this letter, that no action is taken on updating the ownership of these water rights as there may be a dispute that culminates in a quiet title action to determine ownership of these water rights. It appears that there was a typo in the original Decree and the question then is where was the original place of use decreed to, and additionally, has there been a change in the location of the place of use of these water rights. At a minimum, Widmer Ranch, LLC owns a portion of the property that is adjacent to property owned by Laura Widmer, and Widmer Ranch would be entitled to a split of the Samuel Widmer Rights even if the typo placed the water right on her property. More likely, however, is that the Samuel Widmer Rights have been delivered and used on property owned by Widmer Ranch, LLC and its predecessors for many, many years. Widmer Ranch, LLC also believes it has paid all or most of the associated water district costs associated with delivery of these water rights. Widmer Ranch, LLC intends to discuss the matter directly with Laura Widmer, and is hopeful that the parties can come to some agreement regarding the water rights. However, to avoid any unnecessary confusion in a potential quiet title action, we request that the Department take no administrative action to update its ownership records of the Samuel Widmer Rights until further notice from the parties.

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We appreciate your attention to this matter. If you have any questions, please let me know.

Best regards,

A handwritten signature in black ink, appearing to read "Robert L. Harris".

Robert L. Harris
HOLDEN, KIDWELL, HAHN & CRAPO, P.L.L.C.

RLH/rew

cc: Laura Widmer

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