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DEPT OF WATER RESOURCES
SOUTHERN REGION

David A. Coleman, ISB #5742
COLEMAN, RITCHIE & CLUFF
156 2nd Avenue West
P.O. Box 525
Twin Falls, ID 83303-0525
Telephone: 208-734-1224
Fax: 208-734-3983

Attorney for Intervenor and Protestant W.T. Williams, Inc.

BEFORE THE DEPARTMENT OF WATER RESOURCES

OF THE STATE OF IDAHO

IN THE MATTER OF APPLICATION FOR
TRANSFER NO. 80058 (Mathers Ranch, Inc.)

MOTION TO INTERVENE

COMES NOW W.T. Williams, Inc., by and through its attorney David A. Coleman of the firm Coleman, Ritchie & Cluff, hereby moves to intervene as a person with a direct and substantial interest in the proceeding pursuant to Rule 156 and Rules 350 through 354 of the Rules of Procedure of the Idaho Department of Water Resources. W.T. Williams, Inc., desires to intervene and to be allowed to protest the transfer.

The Intervenor is W.T. Williams, Inc, with a mailing address of 3094 North 3200 East, Twin Falls, Idaho 83301. Its registered agent is Thomas A. Williams whose address is 2941 East 2600 North, Twin Falls, Idaho 83301.

W.T. Williams, Inc., has a direct and substantial interest in this water transfer. It owns or controls the ditch which conveys the water from McMullen Creek to the McMullen Reservoir. W.T. Williams, Inc., constructed the ditch from McMullen Creek to McMullen Reservoir for the purpose of conveying its McMullen Creek water rights to a storage reservoir

that W.T. Williams, Inc., constructed in 1946. This reservoir is now referred to as McMullen Reservoir. It has maintained said ditch and reservoir since the construction.

With this transfer, it appears that Mathers Ranch, Inc., intends to use the ditch and reservoir to convey the water it intends to transfer. W.T. Williams, Inc., owns the real property upon which the reservoir sits and has full right to control the reservoir. Mathers Ranch, Inc., has no right or authorization to use the private ditch and private reservoir of W.T. Williams, Inc.

Additionally, the water right that Mathers Ranch, Inc., intends to transfer is junior to the water rights of W.T. Williams, Inc., and to N Ranch, LLC. There is seldom enough water in McMullen Creek to fill the Mathers Ranch, Inc., water right. On the occasion when the water rights of N Ranch, LLC, and W.T. Williams, Inc., are being filled and there is sufficient water to fill the Mathers Ranch, Inc., right, the conveyance ditch does not have sufficient capacity to convey the additional water.

W.T. Williams, Inc., moves to intervene in this transfer and to be added as a protestant because it has a direct and substantial interest in the transfer as described herein.

DATED this 22nd day of July, 2015.

COLEMAN, RITCHIE & CLUFF

By 
DAVID A. COLEMAN

Attorneys for W.T. Williams, Inc.

CERTIFICATE OF MAILING

I hereby certify that on the 22nd day of July, 2015, I served the foregoing
MOTION TO INTERVENE by causing to be deposited a copy thereof in the post office at Twin
Falls, Idaho, enclosed in an envelope with postage prepaid, addressed to the following:

Mathers Ranch, Inc,
Doug Mathers
3485 East 3100 North
Kimberly, Idaho 83341

N Ranch, LLC
Jamey Kinsey
3497 East 3000 North
Kimberly, Idaho 83341

Bureau of Land Management
Idaho State Office
Fred Price
1387 S Vinnell Way
Boise, Idaho 83709



DAVID A. COLEMAN

FOR OFFICE USE ONLY

Fee: \$25.00

Receipt No. 5034917

Receipt by: DM

Date Received: 7-22-2015