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April 3, 2008

Allen D. Merritt
Southern Regional Office
Idaho Department of Water Resources
1341 Fillmore St., Ste. 200
Twin Falls, ID 83301-3033

Re: Cove Springs Development, Inc.
Application No. 37-22161
Transfer No. 74266

Dear Mr. Merritt:

I am enclosing the original and a copy of the Notice of Substitution of Counsel and Entry of Appearance for Application No. 37-22161 and Transfer No. 74266. Kindly file the original and have your assistant date stamp the copy and return to our office in the self-addressed stamped envelope. Should you have any concerns, please contact us.

Sincerely,

Lori Anderson

Assistant to Jeffrey C. Fereday

Enclosures

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Attorney for Applicant, Cove Springs Development Inc.

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

IN THE MATTER OF WATER RIGHT
TRANSFER APPLICATION NO. 74266 IN
THE NAME OF COVE SPRINGS
DEVELOPMENT, INC.

**NOTICE OF SUBSTITUTION OF
COUNSEL AND ENTRY OF
APPEARANCE**

PLEASE TAKE NOTICE that the firm of Givens Pursley LLP hereby substitutes as counsel of record for Applicant Cove Springs Development, Inc. in place of the law firm of Speck & Aanestad and hereby enters its appearance as counsel of record for Applicant in this matter. Please direct all future pleadings, correspondence, and notices to Jeffrey C. Fereday, Givens Pursley LLP, 601 W Bannock, P.O. Box 2720, Boise, Idaho 83702.

DATED this 3d day of April, 2008.

Respectfully submitted,

GIVENS PURSLEY LLP


Jeffrey C. Fereday

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd of April, 2008, the foregoing was filed, served, or copied as follows:

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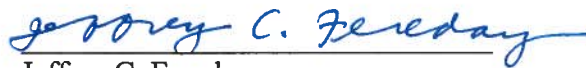
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