

M^cHUGH BROMLEY
ATTORNEYS AT LAW, PLLC

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SEP 19 2024

**WATER RESOURCES
WESTERN REGION**

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(208) 287-0991

Chris M. Bromley
cbromley@mchughbromley.com

September 16, 2024

Nick Miller
IDWR Western Region
2735 W. Airport Way
Boise, ID 83705-5082

Re: Additional Protest Fees to T. 88631

Dear Nick:

Enclosed is a check in the amount of \$100 for additional protest fees associated with T. 88631 in the name of Dry Creek Water Company, LLC. These are fees associated with my clients Kathleen and Michael Brady, Leslie Nona, Marian Shaw, Julia and Robert Whiting, and Echanove Ranch Homeowners Assn, as to the protest that I filed on their behalf on August 30, 2024.

Thank you very much for talking through the need for additional fees.

Sincerely,



CHRIS M. BROMLEY

Encl.

Hobson, Susan

From: Chris Bromley <cbromley@mchughbromley.com>
Sent: Friday, August 30, 2024 12:28 PM
To: IDWR File
Subject: Notice of Protest, Transfer No. 88631 (Dry Creek Water Co.)
Attachments: 20240830 Notice of Protest.pdf

CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

Hello,

Please find attached a *Notice of Protest* regarding Application for Transfer No. 88631. Since the protest requires a filing fee, it will also be hand delivered today with IDWR, along with a check.

Thanks,

Chris M. Bromley
McHugh Bromley, PLLC
PO Box 107
Boise, Idaho 83701
(208) 287-0991
www.mchughbromley.com

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Aug 30, 2024

DEPARTMENT OF
WATER RESOURCES

Received \$25.00
C118816 8/30/24 -KT

Received \$100.00
W052204 9/19/24 -MB

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*Attorneys for Kathleen and Michael Brady,
Leslie Nona, Marian Shaw, Julia and Robert
Whiting, and Echanove Ranch Homeowners
Assn.*

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

IN THE MATTER OF APPLICATION FOR
TRANSFER NO. 88631 IN THE NAME OF
DRY CREEK WATER COMPANY LLC

Fee Category: \$25

NOTICE PROTEST

COMES NOW Kathleen and Michael Brady, Leslie Nona, Marian Shaw, Julia and Robert Whiting, and Echanove Ranch Homeowners Assn. (collectively referred to herein as the "Protestants"), by and through their attorneys of record, McHugh Bromley, PLLC, and hereby file this *Protest* against Application for Transfer No. 88631 ("Application") filed by Dry Creek Water Company, LLC ("Applicant"). The initial bases for the *Protest* are as follows:

1. The Applicant has not explained how the water rights that are the subject of the Application will not be enlarged.
2. The Applicant has not explained how the Application will be administered as to existing water rights.

3. If there is insufficient water, improper administration, and/or monitoring 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, including the water rights of the Protestants.
4. This Protest may be resolvable with additional information from the Applicant to the Protestants, including but not limited to acknowledgment and incorporation of the prior settlement agreements between the Applicant and the Protestants, as recently recognized by the Idaho Department of Water Resources when it issued its *Order Approving Settlement and Confirming Withdrawal of Protests* (May 15, 2023), which then incorporated settlement terms and principles in *Amendment of Permit No. 63-32423* (June 13, 2023).
5. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 30th day of August, 2024.



Chris M. Bromley

McHugh Bromley, PLLC

Attorneys for Kathleen and Michael Brady, Leslie Nona, Marian Shaw, Julia and Robert Whiting, and Echanove Ranch Homeowners Assn.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of August, 2024, I served a true and correct copy of the foregoing document on the person(s) whose names and addresses appear below by electronic service:

IDAHO DEPARTMENT OF WATER RESOURCES
PO Box 83720
Boise, ID 83720
Hand Delivered

Terry Scanlan
HDR
412 E. Parkcenter Blvd
Boise, ID 83706
terry.scanlan@hdrinc.com



CHRIS M. BROMLEY