

## Evans, Lynne

---

**From:** Michael P. Lawrence <mpl@givenspursley.com>  
**Sent:** Monday, February 24, 2025 5:31 PM  
**To:** IDWR File; Chris M. Bromley Esq. (cbromley@mchughbromley.com); Candice M. McHugh Esq. (cmchugh@mchughbromley.com); Bryce Farris Esq. (bryce@sawtoothlaw.com); ecf@parsonsbehle.com; Work; Garrett M. Kitamura; Miller, Nick  
**Subject:** In re Permit Nos. 61-12090, 61-12096, 63-32499, and 63-35473 [GP-DMS.016316.0002.FID1021522]  
**Attachments:** Mayfield Ranch Response to Juniper Petition 2025-02-24\_18804009\_1.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.

---

Attached please find Mayfield Ranch LLC's response to Juniper Station Farm, LLC's *Petition to Cancel and Void Permit Nos. 61-12090, 61-12096, 63-32499, and 63-35473*.

Thanks,  
Mike

---

MICHAEL P. LAWRENCE

GIVENS PURSLEY LLP

601 West Bannock Street, Boise, ID 83702

main 208-388-1200

direct 208-388-1294

fax 208-388-1300

[mpl@givenspursley.com](mailto:mpl@givenspursley.com)

[www.givenspursley.com](http://www.givenspursley.com)

---

CONFIDENTIALITY NOTICE: This communication is confidential and may contain privileged information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

Michael P. Lawrence [ISB No. 7288]  
GIVENS PURSLEY LLP  
601 West Bannock Street  
P.O. Box 2720  
Boise, Idaho 83701-2720  
Office: (208) 388-1200  
Fax: (208) 388-1300  
www.givenspursley.com  
*Attorneys for Mayfield Ranch LLC*

RECEIVED

Feb 24, 2025

DEPARTMENT OF  
WATER RESOURCES

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

IN THE MATTER OF PERMIT NO. 61-12090  
(NEVID LLC); PERMIT NO. 61-12096  
(NEVID LLC); PERMIT NO. 63-32499  
(MAYFIELD TOWNSITE LLC); AND  
PERMIT NO. 63-35473 (MAYFIELD RANCH  
LLC)

**MAYFIELD RANCH'S INITIAL  
RESPONSE TO JUNIPER'S  
PETITION TO CANCEL AND  
VOID PERMIT NOS. 61-12090,  
61-12096, 63-32499, AND 63-35473**

Mayfield Ranch LLC ("Mayfield Ranch"), by and through its attorneys of record, Givens Pursley LLP, pursuant to the Department's Rule of Procedure 220.02.b, IDAPA 37.01.01.220.02.b, hereby responds to the *Petition to Cancel and Void Permit Nos. 61-12090, 61-12096, 63-32499, and 63-35473* ("Petition") filed by Juniper Station Farm, LLC ("Juniper") on February 10, 2025.

Juniper asks the Department to "set a hearing in order to cancel and void permit nos. 61-12090 (Nevid, LLC), 61-12096 (Nevid, LLC), 63-32499 (Mayfield Townsite, LLC), and 63-35473 (Mayfield Ranch, LLC) . . . ." *Petition* at 1. Juniper cites Idaho Code Section 42-303, which provides that that the Department "shall issue a notice" upon receipt of a petition for cancellation of a permit, and shall set a hearing "not less than sixty (60) nor more than ninety (90) days from the date of the notice" for the permit holder to show cause why the permit should not be cancelled. *Petition* at 5-6; I.C. § 42-303.

**SUPPORT DATA**

**IN FILE # 61-12090**

Here, the Department has not yet issued any notice pursuant to Idaho Code Section 42-303. Nevertheless, Mayfield Ranch files this response in accordance with the Department's Rules of Procedure which require the filing of responses to motions within 14 days of the filing of a motion. IDAPA 37.01.01.220.02.b.<sup>1</sup> This response is filed without prejudice to Mayfield Ranch's rights to further respond to the *Petition* pursuant to Title 42, Idaho Code, or otherwise.

Mayfield Ranch disagrees with the legal and factual allegations set forth in the *Petition*, and disputes that its accompanying *Declaration of Mike Eisenman* accurately or completely describes the work that has been completed toward developing Mayfield Ranch's permit no. 63-35473 ("Mayfield Ranch's Permit").

Mayfield Ranch's Permit authorizes groundwater diversions up to 3.48 cfs and 1503.4 acre-feet per year for municipal use. It was originally authorized in 2016 as part of parent permit no. 63-32499, and Mayfield Ranch acquired its interests in that permit in 2022 and 2023 resulting in what is now Mayfield Ranch's Permit. Mayfield Ranch's municipal water use is intended to supply a planned community, which among other things requires obtaining county land use approvals. Mayfield Ranch has diligently worked to obtain the necessary land use approvals and has incurred significant expense in pursuit of developing the planned community and putting Mayfield Ranch's Permit to beneficial use, including without limitation:

- project planning and design;
- ordering, purchasing, and installing infrastructure equipment and materials for the planned community; and
- working through county processes required to develop the planned community and put municipal water to beneficial use under the permit.

---

<sup>1</sup> Juniper questions in its *Petition* whether its filing is a "petition" under I.C. § 42-301 or a "motion" under IDAPA 37.01.01.220. Due to this uncertainty, Mayfield Ranch is filing this response in accordance with IDAPA 37.01.01.220.02.b.

Mayfield Ranch is entitled to develop Mayfield Ranch's Permit in accordance with Idaho law, including pursuant to extensions authorized under Idaho Code Section 42-204. Section 42-204 provides statutory rights to obtain extensions that the Idaho Legislature granted more specifically and more recently than the general authorities provided in the statutes Juniper relies upon in its *Petition* (which were enacted in 1909 and have not been subsequently amended).

If and when IDWR issues a notice pursuant to Idaho Code Section 42-203, Mayfield Ranch will participate in that process as required by statute and Department Rules and orders.

Respectfully submitted this 24th day of February, 2025.

GIVENS PURSLEY LLP



By: \_\_\_\_\_  
Michael P. Lawrence

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 24<sup>th</sup> day of February, 2025, a true and correct copy of the foregoing was filed electronically with the Idaho Department of Water Resources ([file@idwr.idaho.gov](mailto:file@idwr.idaho.gov)) and served by email to the following:

Chris M. Bromley  
Candice M. McHugh  
McHugh Bromley PLLC  
380 S. 4th Street, Suite 103  
Boise, ID 83702  
[cbromley@mchughbromley.com](mailto:cbromley@mchughbromley.com)  
[cmchugh@mchughbromley.com](mailto:cmchugh@mchughbromley.com)  
*Attorneys for Juniper Station Farm, LLC*

Bryce S. Farris  
SAWTOOTH LAW OFFICES, PLLC  
1101 W. River St., Ste. 110  
Boise, ID 83707  
[bryce@sawtoothlaw.com](mailto:bryce@sawtoothlaw.com)  
*Attorneys for Nevid LLC*

Norman Semanko  
Garrett Kitamura  
Parsons Behle & Latimer  
800 W. Main St., Ste. 1300  
Boise, ID 83702  
[ecf@parsonsbehle.com](mailto:ecf@parsonsbehle.com)  
[nsemanko@parsonsbehle.com](mailto:nsemanko@parsonsbehle.com)  
[gkitamura@parsonsbehle.com](mailto:gkitamura@parsonsbehle.com)  
*Attorneys for Mayfield Townsite LLC*

Nick Miller  
IDWR Western Region  
2735 Airport Way  
Boise, ID 83705-5082  
[Nick.Miller@idwr.idaho.gov](mailto:Nick.Miller@idwr.idaho.gov)



---

Michael P. Lawrence