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Attorneys for Edwards Family LLC



BEFORE THE DEPARTMENT OF WATER RESOURCES OF
THE STATE OF IDAHO

IN THE MATTER OF APPLICATION FOR
TRANSFER NO. 90071 IN THE NAME OF
VEOLIA WATER IDAHO, INC.

PETITION FOR RECONSIDERATION

Protestant Edwards Family LLC (“Edwards”), by and through undersigned counsel of record and pursuant to Idaho Code Sections 67-5243(3) and 67-5245(3) and the Department’s Rule of Procedure 730.02(b), hereby files this Petition for Reconsideration of the Department’s *Transfer Approval Notice* served on the parties in the above-referenced matter on July 14, 2026.

The bases for this Petition follow:

First, the Conditions of Approval addressing “alternate points of diversion” (APODs), which generally begin with the text, “To the extent necessary for administration.....” appear to differ from the language agreed upon by the parties in that certain *Stipulation and Joint Motion to Approve Transfer* of May 1, 2026.

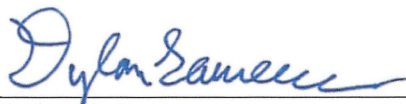
Second, some of the APOD conditions appear to include inaccurate references to prior water right partial decrees. For example, Condition 2 on the approvals for Water Right Nos. 63-31856 and 63-31857 describes a partial decree dated “9/18/2009,” while the relevant partial decree of which Edwards is aware is dated November 18, 2009. Similarly, Condition 3 on the

approval for Water Right No. 63-2915 describes a partial decree dated “5-10-2010,” while the relevant partial decree of which Edwards is aware is dated May 5, 2010.

More generally, Edwards finds these deviations from the original language of the Stipulation confusing and is concerned that future readers of these documents will find the Conditions of Approval difficult to interpret and implement. Edwards further submits that, under these circumstances, the Department should have issued a draft transfer approval for the parties to review and evaluate before triggering the formal response deadline. However, the Department skipped this step and issued a formal approval, leaving relatively little time for review and consideration, in light of the number of water rights and points of diversion involved. Given the short amount of time to react to the transfer approval, Edwards was forced to file this Petition for Reconsideration.

VARIN THOMAS LLC

July 27, 2026:



Dylan B. Lawrence

Attorneys for Protestant Edwards Family LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of July 2026, a true and correct copy of the foregoing was filed and/or served upon the following individual(s) by the means indicated:

DOCUMENT FILED:

Idaho Department of Water Resources

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U.S. Mail, postage prepaid
Express Mail
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Efile: file@idwr.idaho.gov

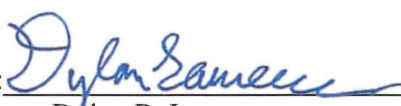
DOCUMENT SERVED:

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Counsel for Applicant Veolia Water Idaho, Inc.

By: 
Dylan B. Lawrence

Bozdog, Marina

From: Dylan Lawrence <dylan@varinthomas.com>
Sent: Monday, July 27, 2026 4:19 PM
To: IDWR File
Cc: Michael P. Lawrence
Subject: Pet. for Recon. re Transfer No. 90071 (Veolia)
Attachments: 2026-07-27 Petition for Reconsideration.pdf

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Good afternoon. I've attached a document here for filing in the above-referenced matter. Please let me know of any issues accessing the attachment.

Thank you,
Dylan

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