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OCT 06 2014

DEPARTMENT OF  
WATER RESOURCES

*Attorneys for United Water Idaho Inc.*

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

IN THE MATTER OF ACCOUNTING FOR  
DISTRIBUTION OF WATER TO THE  
FEDERAL ON-STREAM RESERVOIRS IN  
WATER DISTRICT 1

**UNITED WATER'S  
PETITION TO INTERVENE**

United Water Idaho Inc. ("United Water"), through its counsel Givens Pursley LLP, files *United Water's Petition to Intervene* ("Petition") in the above-captioned matter pursuant to IDAPA 37.01.01.350 to .354.

United Water meets the criteria to intervene in this proceeding. First, no date has yet been set for a pre-hearing conference, and therefore, this Petition is timely pursuant to IDAPA 37.01.01.352.

Second, United Water has a "direct and substantial interest" in this proceeding. IDAPA 37.01.01.350, .351, .353. United Water holds Boise River natural flow water rights and storage entitlements in Lucky Peak and Anderson Ranch reservoirs in Water District 63. United Water is a party to the Water District 63 proceedings initiated by the Department concerning subject matters also set to be addressed in the above-captioned Water District 1 proceeding. The Department has acknowledged that "there is some overlap in the concerns and objections raised in connection with the reservoir and accounting systems in Water District 1 and Water District

63.” *Notice of Contested Case and Formal Proceedings, and Notice of Status Conference*, p. 1 (Oct. 22, 2013).

United Water has a right to participate in any proceeding that could affect the definition or administration of storage water rights in federal reservoirs in the state of Idaho. It is not clear at this point how the Water District 01 and Water District 63 proceedings might develop or how their common issues may be set up. United Water seeks intervention in the Water District 1 proceeding so it can ensure it is entitled to participate fully in matters that may affect its interests in Water District 63.

United Water intends to participate as a party in the above-captioned proceeding, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. Copies of all pleadings, production requests and/or responses, notices, orders, correspondence and other documents should be provided to Christopher H. Meyer and Michael P. Lawrence at the above address.

For the foregoing reasons, United Water respectfully requests that the Director grant its Petition to Intervene in these proceedings and allow United Water to appear and participate fully in all matters that may arise.

DATED this 6<sup>th</sup> day of October, 2014.

Respectfully submitted,

GIVENS PURSLEY LLP

By   
Michael P. Lawrence

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 6<sup>th</sup> day of October 2014, the foregoing was filed, served, and copied as follows:

**DOCUMENT FILED:**

Idaho Department of Water Resources	<input type="checkbox"/>	U. S. Mail
Gary Spackman, Director	<input checked="" type="checkbox"/>	Hand Delivered
322 East Front Street	<input type="checkbox"/>	Overnight Mail
P.O. Box 83720	<input type="checkbox"/>	Facsimile
Boise, ID 83720-0098	<input checked="" type="checkbox"/>	E-mail

**DOCUMENT SERVED:**

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<p>JAMES C TUCKER  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83702  <a href="mailto:jamestucker@idahopower.com">jamestucker@idahopower.com</a></p>	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email
<p>DAVID GEHLERT  US DEPT OF JUSTICE  999 18<sup>TH</sup> ST SOUTH TERRACE STE 370  DENVER CO 80202  <a href="mailto:david.gehlert@usdoj.gov">david.gehlert@usdoj.gov</a></p>	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email
<p>JOHN K SIMPSON  TRAVIS L THOMPSON  PAUL L ARRINGTON  BARKER ROSHOLT &amp; SIMPSON  195 RIVER VISTA PLACE STE 204  TWIN FALLS ID 83301-3029  <a href="mailto:jks@idahowaters.com">jks@idahowaters.com</a>  <a href="mailto:tlt@idahowaters.com">tlt@idahowaters.com</a>  <a href="mailto:pla@idahowaters.com">pla@idahowaters.com</a></p>	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email
<p>W KENT FLETCHER  FLETCHER LAW OFFICE  PO BOX 248  BURLEY ID 83318  <a href="mailto:wkf@pmt.org">wkf@pmt.org</a></p>	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Email
<p>CONSOLIDATED FARMERS CANAL  3215 N 2000 W  REXBURG ID 83440</p>	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
<p>SOUTHEAST IDAHO CANAL CO  PO BOX 15  ST ANTHONY ID 83445</p>	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
<p>THE NEW LAVASIDE DITCH CO LTD  ATTN VON CORNELISON  66 E RIVER RD  BLACKFOOT ID 83221</p>	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email

SOUTH FORK OF THE SNAKE RIVER WATER USERS ATTN DARRELL KER 4861 N 44TH E IDAHO FALLS ID 83401	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
SOUTH FORK OF THE SNAKE RIVER WATER USERS ATTN STAN HAWKINS BOX 367 UCON ID 83454	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
DE LLOYD JACOBSON PO BOX 68 SWAN VALLEY ID 83449	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
TED MICKELSEN 2255 N 4000 W TETONIA ID 83452	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
ROGER LING PO BOX 623 RUPERT ID 83350	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
GARY DIAL 1448 N 800 E SHELLEY ID 83274	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
STAN NIELSON 1234 E 1000 N SHELLEY ID 83274	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
GREG BURNS 655 12 <sup>TH</sup> AVE SLC UT 84103	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
RANDY BINGHAM 20 E 220 S BURLEY ID 83316	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
DAN DARRINGTON 705 E 300 S BURLEY ID 83316	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email

LEONARD BECK 272 W 200 S BURLEY ID 83316	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
CLIFFORD SEARLE 500 E 500 S BURLEY ID 83316	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
DEAN EDGAR 480 E 400 S BURLEY ID 83316	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
GARY BLANCHARD 355 SKYLANE POCATELLO ID 83204	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
NEIL MORGAN 762 W HWY 39 BLACKFOOT ID 83221	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
STEVEN MURDOCK PEOPLES CANAL & IRRIGATION CO. 1050 W HWY 39 BLACKFOOT ID 83221	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
RON HANSEN 6935 N 500 W TETONIA ID 83452	<input checked="" type="checkbox"/> U.S. Mail, postage prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Facsimile <input type="checkbox"/> Email
MIKE LEGGE <a href="mailto:mlegge@usmagnesium.com">mlegge@usmagnesium.com</a>	<input checked="" type="checkbox"/> Email



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