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DEPARTMENT OF
WATER RESOURCES

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Attorney for Bonneville-Jefferson Ground Water District

STATE OF IDAHO

DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF THE MITIGATION
PLAN OF FALLS WATER CO., INC.

Docket No. CM-MP-2024-004

PETITION TO INTERVENE

IN THE MATTER OF DISTRIBUTION OF
WATER TO VARIOUS WATER RIGHTS
HELD BY OR FOR THE BENEFIT OF
A&B IRRIGATION DISTRICT,
AMERICAN FALLS RESERVIOR
DISTRICT #2, BURLEY IRRIGATION
DISTRICT, MILNER IRRIGATION
DISTRICT, MINIDOKA IRRIGATION
DISTRICT, NORTH SIDE CANAL
COMPANY, AND TWIN FALLS CANAL
COMPANY

COMES NOW the Bonneville-Jefferson Ground Water District (hereafter “Bonneville-Jefferson”), by and through counsel, Skyler C. Johns of Olsen Taggart PLLC, and hereby files this *Petition to Intervene* pursuant to IDAPA 37.01.01.350.

Bonneville-Jefferson is an Idaho ground water district organized pursuant to title 42, chapter 52, Idaho Code. Bonneville-Jefferson represents ground water users in the counties of Bonneville and Jefferson.

Bonneville Jefferson has a direct and substantial interest in the proceeding for the following reasons: 1) the applicant in this matter, Falls Water Co., Inc. (hereafter “Applicant”), is a current member of Bonneville-Jefferson; 2) Bonneville-Jefferson and its members participate in and

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provide mitigation under the recently approved 2024 Stipulated Mitigation Plan (hereafter “Stipulated Plan”) between members of the Idaho Ground Water Appropriators and the Surface Water Coalition and the Applicant’s proposed mitigation plan may affect Bonneville-Jefferson’s performance under the 2024 Stipulated Mitigation Plan; 3) Bonneville-Jefferson and its members may be affected by the mitigation methods proposed by the Applicant, and 4) the water rights in which Bonneville-Jefferson represents may be affected by the outcome of this formal proceeding.

Based on the foregoing, Bonneville-Jefferson respectfully requests an order from the Director permitting it to intervene in this matter.

DATED: March 28, 2025

OLSEN TAGGART PLLC

/s/ Skyler C. Johns
Skyler C. Johns, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of March 2025, I served the foregoing document on the persons below via email as indicated:

/s/ Skyler C. Johns
Skyler C. Johns

Mathew Weaver, Director Garrick Baxter, Deputy Attorney General IDAHO DEPT. OF WATER RESOURCES P.O. Box 83720 Boise, Idaho 83720-0098	file@idwr.idaho.gov mathew.weaver@idwr.idaho.gov garrick.baxter@idwr.idaho.gov
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