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Sep 25, 2024

DEPARTMENT OF  
WATER RESOURCES

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*Attorneys for Edwards Family LLC*

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

IN THE MATTER OF THE BOISE  
FRONT LOW TEMPERATURE  
GEOTHERMAL RESOURCE  
GROUND WATER MANAGEMENT  
AREA

**NON-OPPOSITION TO  
PETITION TO INTERVENE**

Edwards Family LLC (“Edwards”), through undersigned counsel of record, hereby files this non-opposition to the City of Boise’s Petition to Intervene of September 23, 2024. The City seeks permission to intervene in the proceeding initiated by the Edwards Petition for Hearing of May 17, 2024, which seeks more information from the Department regarding the basis for extending the moratorium in the above-referenced matter for three years instead of five years. Edwards believes the City satisfies the relevant standards and that granting intervention is appropriate.

Please note, because the City is the only party that filed a petition to intervene in this matter, Edwards intends to cease serving copies of filings in this

matter on the recipients identified in the Certificate of Service as receiving courtesy copies of this non-opposition, unless they specifically request to continue to receive courtesy copies of such filings.

DATED this 25th day of September, 2024.

Varin Thomas LLC

A handwritten signature in blue ink, appearing to read "Dylan Lawrence", written over a horizontal line.

Dylan B. Lawrence  
Attorneys for Edwards Family LLC

## CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of September, 2024, I caused to be filed with the Department and served a true and correct copy of the foregoing by email, addressed to the following:

*Original:*

Idaho Department of Water Resources  
[file@idwr.idaho.gov](mailto:file@idwr.idaho.gov)

Shelley Keen  
Idaho Department of Water Resources  
[shelley.keen@idwr.idaho.gov](mailto:shelley.keen@idwr.idaho.gov)  
*Hearing Officer*

*Service copy:*

Mary R. Grant  
Deputy City Attorney  
Boise City Attorney's Office  
[mgrant@cityofboise.org](mailto:mgrant@cityofboise.org)  
*Attorneys for the City of Boise*

*With courtesy copies to:*

Erika Malmen  
Perkins Coie LLP  
[emalmen@perkinscoie.com](mailto:emalmen@perkinscoie.com)  
*Attorneys for the City of Boise*

Garrick Baxter  
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*Attorneys for the Department of Lands*



Dylan B. Lawrence

## Hersley, Jean

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**From:** Keen, Shelley  
**Sent:** Wednesday, September 25, 2024 9:24 AM  
**To:** Hersley, Jean  
**Subject:** FW: Filing in Boise Front GWMA matter  
**Attachments:** 2024-09-25 Non-opposition to Pet to Intervene.pdf

**From:** Dylan Lawrence <dylan@varinthomas.com>  
**Sent:** Wednesday, September 25, 2024 9:18 AM  
**To:** IDWR File <file@idwr.idaho.gov>; Keen, Shelley <Shelley.Keen@idwr.idaho.gov>; Mary Grant <mrgrant@cityofboise.org>  
**Cc:** Malmen, Erika E. (BOI) <EMalmen@perkinscoie.com>; Baxter, Garrick <Garrick.Baxter@idwr.idaho.gov>; Ali Breshears <ali.breshears@ag.idaho.gov>; Niky Robles <Niky.Robles@ag.idaho.gov>; lyndonlegal@gmail.com; Andy Waldera <andy@sawtoothlaw.com>; JJ Winters <JWinters@idl.idaho.gov>  
**Subject:** Filing in Boise Front GWMA matter

**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.**

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Good morning.

I have attached here a filing in the above-referenced matter. Please let me know of any issues with the attachment.

Thank you,  
Dylan

### Dylan Lawrence

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