

Veronica Douglass
Deep Creek Mountains Ranch
380 Callao Star Route
Wendover, Utah 84083

June 9, 2008

Mr. Tracy Taylor, P.E.
State Engineer
901 South Stewart Street, Suite 2002
Carson City, Nevada 89701-5250

State	'S EXHIBIT 12
DATE:	7-15-08

Re: Recognition as Interested Person--Application No. 54022

Dear Mr. Taylor:

Pursuant to NAC 533.100, Veronica Douglass, Deep Creek Mountains Ranch hereby requests recognition as an Interested Person with respect to Application No. 54022. Enclosed is the \$25.00 fee required by NAC 533.100, as per Application No. 54022.

Pursuant to NAC 533.100(2), Veronica Douglass, Deep Creek Mountains Ranch hereby sets forth the following grounds in support of a showing of extreme circumstances that prevented Veronica Douglass, Deep Creek Mountains Ranch from filing a protest to Application No. 54022, in a timely manner:

1. I Veronica Douglass, am a property owner of the Deep Creek Mountains Ranch, Juab County, Utah. We have owned this ranch since 1972 and raise agricultural crops for livestock, wildlife, and domestic uses. We are ranchers who depend on our water resources from the Deep Creek Mountains in Snake Valley for our economic livelihood. We have 195 acres under agricultural use. We also maintain 2.0 surface acres of pond habitat in cooperation and agreement with the Utah Division of Wildlife Resources for the native salmonid Bonneville cutthroat trout recovery in the Deep Creek Mountains, both the East Slope on BLM lands, and the West Slope on the Goshute Indian Reservation.
2. We maintain our livelihood by the existence of ground and surface waters in Snake Valley and the Deep Creek Mountains for our agricultural crops, domestic and hydropower use, and wildlife conservation. We have three Certificated Water Appropriations from the State of Utah, and one well. We depend on this water for our irrigation, domestic, wildlife conservation, and hydropower uses on our ranch. We obtain our water from two surface streams, Granite Creek and Cottonwood Creek on the East Slope of the Deep Creek Mountain Range. We depend on the groundwater recharge from the carbonic aquifer system in Snake Valley to maintain our surface waters to maintain our ranching livelihood.

3. We are filing this request as an Interested Person. We purchased the property with the Certificated Water Rights from Cottonwood Creek in 1972. We have since obtained two more Certificated Water Rights from the State of Utah in 1990 and 2007 for our ranching operations and economic livelihood. We were never given notice in 1989 about the SNWA's application but have become aware of the potential economic and environmental impacts associated with their applications for groundwater withdrawals in Snake Valley. We believe that they pose a significant risk to our continued economic livelihood of our ranch property and that future operation of it for our children and grandchildren.

4. I, Veronica Douglass, Deep Creek Mountains Ranch did not file a protest at the time of the original application because we live in Utah and never saw any notice in any paper of general circulation in my County of Juab. Snake Valley spans the Utah Nevada border and although we will likely be impacted by the proposed groundwater withdrawals, we as a water rights holder in Utah were never notified of the applications as notice was published only in Nevada. The lack of notice to us as Utah residents and the likely widespread, significant multi-State impacts of Southern Nevada Water Authority's (SNWA's) proposed groundwater withdrawals both constitutes extreme circumstances;

We have an established business and agricultural operation in Snake Valley and have a domestic well and other water rights that would be harmed if SNWA's applications are granted; We need to continue our existing business operation activities, and that such expansion will require our continued water availability and existing rights; We are aware of our neighbors and others in Snake Valley and our hydrologically connected valleys who plan to continue their businesses or expand existing businesses and developments, and that the availability of groundwater is necessary for these economic developments in our arid desert ecosystems; our children and grandchildren need our continued source of water for their livelihood and their continued future existence as heirs apparent;

The Deep Creek Mountains Ranch is personally concerned with environmental conservation and recreational activities/projects in Snake Valley, and adjacent hydrologically connected valley basins, that may be harmfully impacted by the SNWA applications. We are involved with both the Utah Division of Wildlife Resources and the Confederated Tribes of the Goshute Reservation in recovery efforts for the Bonneville cutthroat trout, petitioned for listing as Threatened and Endangered, in

Snake Valley. We operate a brood pond facility for the State and need continued existing but scarce water to maintain this resource recovery effort in cooperation with the State of Utah. We are concerned about the environmental and recreational impacts proposed by SNWA's applications on the Bonneville Cutthroat Trout Fisheries Restoration efforts; our past efforts (and continued future efforts) have been paramount and significant in the State of Utah's effort to recover this native fish species and keep it off the Endangered Species listing. Proposed impacts from the SNWA's application could reverse both our and Utah's efforts for complete recovery of this native salmonid fish species and hasten its Federal listing under the Endangered Species Act (ESA).

5. The SNWA is the successor in interest to the Las Vegas Valley Water District (LVVWD), the entity that filed Application No. 54022.
6. SNWA and the LVVWD delayed the consideration of Application No. 54022 for almost 20 years, during which time it has become clear that the water table in Snake Valley already is declining and that the export of water from Snake Valley by SNWA would devastate the economy and environment of Snake Valley. This delay clearly constitutes an extreme circumstance warranting recognition of Veronica Douglass, Deep Creek Mountains Ranch, as an Interested Person for the hearing on Application No. 54022, for which we have enclosed a check for \$25.00 to cover the fee for this application protest.
7. The unprecedented magnitude of the proposed water project and its potential impact also supports a finding of extreme circumstances.
8. SNWA Application No. 54022 seek a quantity of water that would substantially impact the springs and stream flows upon which we and all Snake Valley residents and wildlife depend.
9. Absent recognition as an Interested Person pursuant to NAC 533.100, Veronica Douglass, Deep Creek Mountains Ranch will have no forum in which to present evidence on these potential impacts and their public policy ramifications.

Based on the grounds set forth above, request is respectfully made for recognition as an Interested Person in proceedings to be held on Application No. 54022.

Sincerely,

Veronica Douglass

Veronica Douglass
Deep Creek Mountains Ranch