

Callao Irrigation Company

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June 6, 2008

BY CERTIFIED MAIL

Tracy Taylor, P.E.
State Engineer
Nevada Division of Water Resources
901 South Stewart Street, Suite 2002
Carson City, Nevada 89701

State	'S EXHIBIT	13
DATE:	7-15-08	

Re: Recognition as Interested Person – Application Nos. 54022 – 54030, inclusive

Dear Mr. Taylor:

Pursuant to NAC §533.100, Callao Irrigation Company hereby requests recognition as an Interested Person with respect to Application Nos. 54022 – 54030, inclusive. Enclosed is the \$25.00 fee required by NAC §533.100.

Pursuant to NAC §533.100(2), Callao Irrigation Company hereby sets forth the following grounds in support of a showing of extreme circumstances that prevented Callao Irrigation Company from filing a protest to Application Nos. 54022 – 54030 in a timely manner:

1. Callao Irrigation Company (CIC) is comprised of five privately owned ranches in the community of Callao, Utah, within the Snake Valley that straddles the Utah and Nevada border. Stock in the Callao Irrigation Company is divided between the five ranches. Each of the ranches has one or more irrigation wells used to supplement the surface water from the Deep Creek Mountains that is granted in water rights to the irrigation company.
2. All water rights including surface, groundwater, and natural springs in the Callao area have been either proved or are in the process of being approved by the Utah State Water Engineer. Some of these vested and certificated water rights were granted in the early 1900's.

3. The Callao Irrigation Company did not file a protest at the time of the original application because all members of the Callao Irrigation Company live in Callao, Utah, in Snake Valley which spans the Utah/ Nevada border. Although they will be impacted by the proposed groundwater withdrawals, water rights holders in Utah were never notified of the applications as notice was published only in Nevada. The lack of notice to Utah residents and the likely widespread, significant multi-state impacts of SNWA's proposed groundwater withdrawals both constitute extreme circumstances.
4. Some members of the CIC did not live or possess water rights in Snake Valley and were not aware of developments concerning Snake Valley at the time the applications were filed, nearly 20 years ago. Since then they have moved into Snake Valley and established agricultural operations, and have domestic wells or other water rights that would be impacted if SNWA's applications are granted.

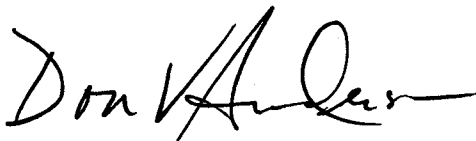
Members of the CIC use the groundwater as a principal source of water to maintain their livelihoods of agricultural production. It is the key to survival as ranchers in Callao. The water owned and used by the members has been put to beneficial use and personal observations indicate that the springs and native meadows have a low tolerance to drought and limited water supply. The ranchers have already observed declines in groundwater levels due to the existing use and the prolonged drought. The irrigation company feels that groundwater within the area of Callao, as well as the entire Snake Valley, has already been allocated. The Callao community believes that water exported out of the region will have permanent and devastating impacts upon all life in Snake Valley.
5. The Southern Nevada Water Authority (SNWA) is the successor in interest to the Las Vegas Valley Water District (LVVWD), the entity that filed Application Nos. 54022 – 54030.
6. SNWA and the LVVWD delayed the consideration of Application Nos. 54022 – 54030 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 Callao Irrigation Company as an Interested Person for the hearing on Application Nos. 54022 – 54030.
7. The unprecedented magnitude of the proposed water project and its potential impact also supports a finding of extreme circumstances.
8. SNWA Application Nos. 54022 - 54030 seek a quantity of water that would substantially impact the springs and stream flows upon which all Snake Valley residents and wildlife depend.

9. Absent recognition as an Interested Person pursuant to NAC §533.100, Callao Irrigation Company will have no forum in which to present evidence on these potential impacts and their public policy ramifications.

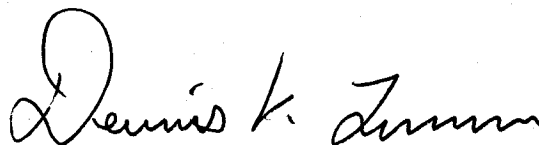
Based on the grounds set forth above, request is respectfully made for recognition as an Interested Person in proceedings to be held on Application Nos. 54022 – 54030.

Sincerely,

Callao Irrigation Company



Don V. Anderson



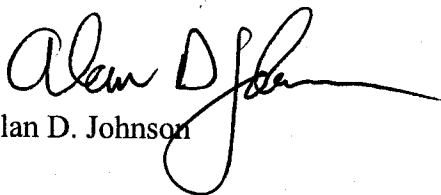
Dennis K. Timm



Beth B. Anderson

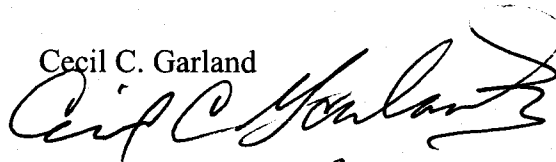


Cindy Timm

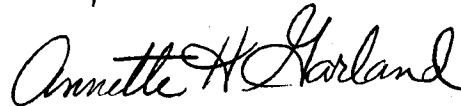


Alan D. Johnson

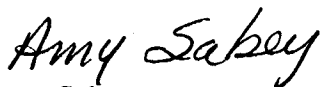
Cecil C. Garland



Shelley C. Johnson



Annette H. Garland



Amy Sabey