

<p>DISTRICT COURT, WATER DIVISION NO. 1, STATE OF COLORADO</p> <p>Weld County Courthouse 901 9th Avenue P.O. Box 2038 Greeley, Colorado 80631 (970) 351-7300</p>	<p style="text-align: right;">DATE FILED: January 6, 2016 11:19 PM</p> <p><input type="checkbox"/> COURT USE ONLY <input type="checkbox"/></p>
<p>Plaintiff: The Jim Hutton Educational Foundation, a Colorado non-profit corporation,</p> <p>v.</p> <p>Defendants: Dick Wolfe, in his capacity as the Colorado State Engineer; David Nettles, in his capacity as Division Engineer in and for Water Division No. 1, State of Colorado; Colorado Division of Water Resources; and Colorado Division of Parks and Wildlife.</p> <p>Defendant-Intervenor: Yuma County Water Authority Public Improvement District.</p> <p>Defendant – Well Owners: Republican River Water Conservation District; City of Wray; City of Holyoke; Harvey Colglazier; Lazier, Inc.; Marjorie Colglazier Trust; Mariane U. Ortner; Timothy E. Ortner; Protect Our Local Community’s Water, LLC; Saving Our Local Economy, LLC; the “North Well Owners”; Tri-State Generation and Transmission Association, Inc.; Dirks Farms Ltd; Julie Dirks; David L Dirks; Don Andrews; Myrna Andrews; Nathan Andrews; Happy Creek, Inc.; J&D Cattle, LLC; 4M Feeders, Inc.; May Brothers, Inc.; May Family Farms; 4M Feeders, LLC; May Acres, Inc.; Thomas R. May; James J. May; Steven D. Kramer; Kent E. Ficken; Carlyle James as Trustee of the Chester James Trust; Colorado Agriculture Preservation Association; Colorado State Board of Land Commissioners; and the City of Burlington.</p>	<p>Case Number: 15CW3018</p> <p>Div. No. 1</p>
<p>Porzak Browning & Bushong LLP Steven J. Bushong (#21782) Karen L. Henderson (#39137) 2120 13th Street Boulder, CO 80302 Tel: 303-443-6800 Fax: 303-443-6864 Email: sjbushong@pbblaw.com; khenderson@pbblaw.com</p>	
<p style="text-align: center;">THE JIM HUTTON EDUCATIONAL FOUNDATION’S RESPONSE TO THE MARKS BUTTE, FRENCHMAN, SANDHILLS, CENTRAL YUMA, PLAINS, W-Y, AND ARIKAREE GROUND WATER MANAGEMENT DISTRICTS’ MOTION TO INTERVENE</p>	

Plaintiff the Jim Hutton Educational Foundation, a Colorado non-profit corporation (“Foundation”), acting by and through undersigned counsel, does hereby provide its Response to the Marks Butte, Frenchman, Sandhills, Central Yuma, Plains, W-Y, and Arikaree Ground Water Management Districts’ (“Districts”) Motion to Intervene dated December 16, 2015 (hereinafter

“Motion”). The Districts seek to intervene as defendants in the above-captioned matter by right pursuant to C.R.C.P. 24(a)(2), C.R.C.P. 24(b)(2), C.R.C.P. 57(j), and C.R.S. §13-51-115. As set forth below, the Foundation respectfully requests that the Districts’ Motion be denied.

A. *Rule 24(a)(2) – Intervention of Right based on Interest.*

1. The Districts first seek to intervene as a matter a right pursuant to C.R.C.P. 24(a)(2), which provides that “[u]pon timely application anyone shall be permitted to intervene in an action ... when the applicant claims an interest relating to the property or transaction which is the subject of the action and he is so situated that the disposition of the action may as a practical matter impair or impede his ability to protect that interest, unless the applicant’s interest is adequately represented by existing parties.”

2. However, “according to the Advisory Committee on Civil Rules, the federal counterpart to C.R.C.P. 24(a) was written to also avoid ‘a cluttering of lawsuits with multitudinous useless intervenors.’” *Concerning Application for Underground Water Rights*, 304 P.3d 1167, 1170 (Colo. 2013) (quoting Benjamin Kaplan, *Continuing Work of the Civil Committee: 1966 Amendments of the Federal Rules of Civil Procedure (I)*, 81 Harv. L.Rev. 356, 403 (1967).

3. Intervention as a matter of right is a fact-specific determination. *Cherokee Metro. Dist. v. Meridian Serv. Metro. Dist.*, 266 P.3d 401, 404 (Colo. 2011). All of the elements set forth in C.R.C.P. 24(a)(2) must be present in order to intervene. See *Diamond Lumber, Inc. v. H.C.M.C., Ltd.*, 746 P.2d 76, 78 (Colo. App. 1987).

4. The first element requires a party seeking to intervene by right to demonstrate an interest relating to the property or transaction that is the subject of the action. The Districts cannot meet this element because they (i) do not have authority to administer the Republican River Compact; (ii) do not have authority to administer surface water rights; (iii) do not have authority over the management of Bonny Reservoir; and (iv) do not own any wells in the Northern High Plains Designated Groundwater Basin (“NHP Basin”). Nevertheless, the Districts assert several sources of “interest” in the property or transactions that are the subject of this case, which are addressed in turn below:

- a. Interest in “preserving and protecting designated groundwater.” The Districts claim that C.R.S. § 37-90-130(2) authorizes and requires them to preserve and protect designated groundwater, and that their ability to do so may be impacted by the outcome of this litigation. But in fact, § 37-90-130(2)(e) authorizes the Districts to “*promulgate reasonable rules and regulations* for the purpose of conserving, preserving, protecting, and recharging the groundwater . . .” (*emphasis added*). The Districts’ rulemaking authority is not at issue in this case; the outcome of this litigation would in no way enlarge, decrease, or interfere with the Districts’ rulemaking powers. Moreover, the Districts use of the word “preserve” throughout their Motion attempts to broaden what is actually a limited statutory authority.
- b. Interest in “administering and regulating wells after well permits are issued.” The Districts state that they are authorized to regulate the use of groundwater within their

respective boundaries, so “any rulings and orders entered by the Court in this case could fundamentally impact or alter” such statutory authority. *See* Motion, p. 6. Essentially, the Districts state that because they stand in the shoes of the Commission for certain matters such as well regulation, they have an interest in those matters. However, as further discussed below, the Foundation fundamentally disagrees that this case involves the Districts’ administrative authority under the 1965 Act. In fact, this Court has already determined that the Commission does not have a substantial interest in the outcome of this litigation. *See* the Court’s Order dated July 8, 2015, p. 6. The Foundation purposefully plead this case much more narrowly than the Districts characterize it in their Motion, which raises the concern that the Districts’ involvement in this litigation will result in the interjection of unrelated issues.

- c. “Interest in the current and future administrative practices of the State Engineer.” The Districts allege that a determination that “the State Engineer is mandated by law to curtail the pumping of designated ground water as part of its Compact administration, could fundamentally impact how the Districts implement their statutory authority and their future interactions with the State Engineer.” *See* Motion, p. 6. As discussed above, this case does not involve the Districts’ statutory authority. Further, alleged impacts to “future interactions” with a state agency is not the type of interest that grants a right to intervene. The scope of this case is limited to surface water rights, Bonny Reservoir, and the Compact. The Districts have no authority regarding administration of interstate compacts. *See* C.R.S. §37-80-104. They also have no authority over surface water rights or Bonny Reservoir. The Foundation fails to see how these alleged interests rise to the level required for intervention.
- d. Interest in “upholding the constitutionality of Senate Bill 52 and the 1965 Act.” The Districts claim they have an interest in upholding the constitutionality of SB-52 and, to the extent it is applicable, the 1965 Act. The Foundation disagrees. The Districts were formed to support the Commission and enforce the law, not litigate the constitutionality of it. As a political subdivision of the state, the Districts are creatures of statute and “have only those powers that are expressly granted to them by the Colorado Constitution or by the General Assembly.” *See Bd. of Cty. Comm'rs of Douglas Cty., Colo. v. Bainbridge, Inc.*, 929 P.2d 691, 699 (Colo. 1996), *as modified on denial of reh'g* (Jan. 13, 1997). In addition, political subdivisions exist “only for the convenient administration of the state government, created to carry out the will of the state.” *Board of County Comm'rs v. Love*, 172 Colo. 121, 125, 470 P.2d 861, 862 (1970). Specifically, the Districts were “formed for the purpose of assisting the [C]ommission” *See Jackson v. State of Colo.*, 294 F. Supp. 1065, 1068 (D. Colo. 1968).

In addition, the Districts have no authority with regard to SB-52 and in the determination of designated groundwater basin described in C.R.S. § 37-90-106. Therefore, the Districts have an even more tenuous claim with regard to SB-52 than the Commission. The Districts also claim the “well users within the Districts want the Districts to be involved in this case” to presumably defend the constitutionality of SB-52. *See* Motion, p. 7. The wishes of well owners, however, does not change the fact that the Districts are limited to the authority granted by statute, which does not include

representing well owners in litigation. *See* C.R.S. § 37-90-118 *et. seq*; *Bd. of Cty. Comm'rs of Douglas Cty., Colo. v. Bainbridge, Inc.*, 929 P.2d 691, 699 (Colo. 1996), *as modified on denial of reh'g* (Jan. 13, 1997). The District develops and enforces regulations that apply to well owners and operators; it does not represent well owners and operators.

- e. “Direct financial interest in preserving the existing boundaries of the NHP Basin.” The Districts claim to have a financial interest in preserving the existing boundaries of the NHP Basin because they are funded by taxes and special assessments levied on real property and wells within their respective boundaries. Presumably, the Districts believe that if the boundaries of the NHP Basin were to be reduced, some of their respective Districts might be correspondingly reduced. This claim is far too attenuated to be the basis of an “interest” for purposes of intervening in this litigation under Rule 24(a)(2). In fact, every single Answer filed in this case — including the Districts’ — has admitted that the Foundation does not seek to redraw the boundary of the NHP Basin in the present litigation. Moreover, this case does not involve a petition before the Commission to change the boundaries of any of the Districts. The boundaries of a particular district are subject to change (inclusion or removal of land) by the Commission “upon a finding that such change would be hydrologically, geologically, and geographically sound.” *See* C.R.S. § 37-90-123. The statutory criteria for determining whether to reduce or enlarge a district’s boundaries does not include any economic considerations. *Id.* If financial concerns are not part of the evaluation when the boundaries of a district are under consideration, they certainly cannot provide a valid “interest” to support intervention in this case where the boundaries are not at issue.
- f. Interest in “any proceedings that involve designated groundwater.” The Districts claim that their participation in this case would be “consistent with the clear legislative intent” set forth in C.R.S. § 37-90-130(2)(i), which allows each district to represent itself “at any hearings or proceedings conducted or authorized by the commission.” However, “statutes are to be construed as a whole, giving effect to every word.” *See Mission Viejo Co. v. Douglas Cty. Bd. of Equalization*, 881 P.2d 462, 464 (Colo. App. 1994). The Districts cannot simply ignore half of the statutory language when it suits them. As acknowledged by the Districts, this case is not conducted or authorized the Commission. Therefore, not only does this statute not apply in this situation, but it is also unclear whether the Districts even have the statutory authority to participate in this case given that no such authority is provided in sections 37-90-118 to 37-90-135. *See* C.R.S. § 37-90-103(9); 37-90-118.

5. To meet the second element for intervention by right under C.R.C.P. 24(a)(2), a party must show that it is so situated that the disposition of the underlying action may, as a practical matter, impair its ability to protect its interest. “An intervenor’s interest is impaired if the disposition of the action in which intervention is sought will prevent any future attempts by the applicant to pursue his interest.” *Feigin v. Alexa Grp., Ltd.*, 19 P.3d 23, 30 (Colo. 2001). Given that the Districts cannot claim an interest in the property that is the subject of this action, they cannot meet the second element requiring them to demonstrate how disposition of this action would impair their ability to protect such alleged interest. Regardless, a ruling in this matter

would not result in any diminishment in the Districts' powers and authority under the 1965 Act, so their ability to protect their interests would not be impaired or impeded.

6. To satisfy the third element, a party must demonstrate that its interest is not adequately represented by existing parties. Given that the Districts cannot satisfy the first two elements of C.R.C.P. 24(a)(2), the question of whether the Districts' "interests" are adequately represented in the above-captioned matter is moot. *See Diamond Lumber, Inc.*, 746 P.2d at 78 ("All three elements of the rule, *i.e.*, a property interest, an impairment in the ability to protect it, and inadequate representation, must be present in order to intervene"). However, in the event the Districts do satisfy the first two elements, they are adequately represented by the existing Defendants. The reason is simple. At the very heart of the matter, the Districts have precisely the same ultimate goal as the Defendant-Well Owners — to uphold the constitutionality of SB-52, and, if applicable, the 1965 Act. There are already 23 attorneys representing well owners that will all be arguing in support of the constitutionality of SB-52, which means the Districts' position on the matter is already more than adequately represented.

7. Timeliness. C.R.C.P. 24 requires timely intervention, and "the issue of timeliness is a threshold question." *Law Offices of Andrew L. Quiat, P.C. v. Ellithorpe*, 917 P.2d 300, 303 (Colo. App. 1995). Since the Districts filed within the time allowed to the NHP Basin Well Owners, the Foundation recognizes that the Districts' Motion may be considered timely filed. However, the Districts provide no justification or explanation for waiting nearly eight months to file their Motion. Based on the Foundation's calculations, the case was at issue on December 16, 2015, so the Foundation does not find the Districts' argument that "the case is still not at-issue" and "the case is still in its early stages" to be compelling. *See Motion*, p. 4.

B. Rule 24(b)(2) – Permissive Intervention.

8. The Districts assert that if the Court does not grant intervention of right, they should be granted permissive intervention pursuant to C.R.C.P. 24(b)(2), which provides that "[u]pon timely application anyone may be permitted to intervene in an action . . . when an applicant's claim or defense and the main action have a question of law or fact in common."

9. When there is no showing that the intervention should be granted as a matter of right, it is within the trial court's discretion whether permissive intervention should be granted. *See Denver Chapter of Colo. Motel Ass'n v. City & County of Denver*, 150 Colo. 524 (1962). Because the standard of review for denial of a request for permissive intervention is abuse of judicial discretion, it can "seldom, if ever, be shown that the trial court had abused its discretion in denying the permissive right to intervene." *Grijalva v. Elkins*, 132 Colo. 315 (1955).

10. The Districts allege that they qualify because their Motion is timely, they are not asserting any new claims that are not already before the Court, and that they "are in a unique position to provide the Court with information concerning the use and administration of designated ground water that will be both relevant and informative concerning the resolution of Plaintiff's claims." *See Motion*, p 10. The Districts do not elaborate on the nature of the information they plan to supply, but given that the Districts have no authority to administer a Compact and, as set forth in their Answer, are "without knowledge or information sufficient to

form a belief as to the truth of the factual allegations” in the Complaint regarding the Compact it seems unlikely the Districts will provide any assistance at all on the matters actually subject to the above-captioned matter.

11. Accordingly, the Foundation disagrees that that permissive intervention should be granted. The Colorado Supreme Court has stated that permissive intervention can be desirable where “such participation [does] no harm and [makes] a more comprehensive decree possible. *N. Poudre Irr. Co. v. Hinderlider*, 112 Colo. 467, 474-75 (1944). However, given the Districts’ lack of authority over surface water rights, Bonny Reservoir, or the Compact, there is little chance that participation by the Districts will result in a “more comprehensive decree.”

12. On the other hand, the Districts’ participation would likely cause harm to the proceedings. First, it will make the case and trial more administratively burdensome than it already is for purposes of filings, scheduling of status conferences, briefing, etc. Second and most importantly, the Districts’ participation could cause harm by confusing the issues and making judgment more difficult to render. *See Grijalva*, 132 Colo. at 318-19, which affirmed the trial court’s denial of intervention and reasoned that “[h]ad intervention been allowed, new and essentially different questions of law and fact would be injected into the case, which would not be common to the issues to be determined between [the parties]. This might complicate the case to such an extent that the jury would become perplexed and be unable to render a just verdict.” The Districts’ offer to provide information regarding the use and its administration of designated groundwater is one example of this potential for confusion because the Foundation believes that such information is neither relevant nor informative to the matters actually at issue in this case, and would only muddle the issues. *See Moreno v. Commercial Sec. Bank*, 125 Colo. 11, 14 (1952)(“It is the duty of courts to respect the integrity of the issues raised by the pleadings between the original parties and to prevent the injection of new issues by intervention”). Moreover, given the number of other parties in the case with the same ultimate goal — upholding the constitutionality of SB-52 — the Districts’ intervention would result in cumulative and duplicative briefing that would be overly burdensome to the Foundation and to this Court.

13. If, however, the Court does grant the Districts the right to permissively intervene, the Foundation requests that the Court use its discretion to limit the Districts’ participation to briefing the constitutionality of SB-52, and to the extent applicable, the constitutionality of the 1965 Act.

C. *Rule 57(j) and C.R.S. §13-51-115.*

14. The Foundation disagrees with the Districts’ claim that C.R.C.P. 57(j) and C.R.S. § 13-51-115 mandate their inclusion in the case. These two provisions provide in part that “[w]hen declaratory relief is sought, all persons shall be made parties who have or claim any interest which would be affected by the declaration, and no declaration shall prejudice the rights of persons not parties to the proceeding.” As discussed above, the Districts do not have an interest in this matter that would be affected by a ruling in this case, nor would a ruling in this case prejudice the Districts’ statutory authority. A final decree between the parties can be made without affecting the Districts’ interest or leaving the controversy in such a situation where the final determination is inequitable to the District. This is further supported by the Court’s

previous findings that the Commission is not a necessary party pursuant to C.R.C.P. 57(j), see Order dated July 8, 2015, and the fact that the Districts were formed to support the Commission as discussed above. As such, the Districts can have no greater interest in the proceedings than the Commission itself. The Districts are not necessary parties.

D. Conclusion.

15. Pursuant to the foregoing, the Foundation respectfully requests that the Districts' Motion be denied. Or, if the Court does grant the Districts the right to permissively intervene, the Foundation requests that the Court use its discretion to limit the Districts' participation to briefing the constitutionality of SB-52, and to the extent applicable, the constitutionality of the 1965 Act.

Respectfully submitted this 6th day of January, 2016.

PORZAK BROWNING & BUSHONG LLP



Steven J. Bushong (#21782)

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Attorneys for the Jim Hutton Educational Foundation

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2016, a true and correct copy of the foregoing **THE JIM HUTTON EDUCATIONAL FOUNDATION’S RESPONSE TO THE MARKS BUTTE, FRENCHMAN, SANDHILLS, CENTRAL YUMA, PLAINS, W-Y AND ARIKAREE GROUND WATER MANAGEMENT DISTRICTS’ MOTION TO INTERVENE** was filed and served by the Integrated Colorado Courts E-Filing System (“ICCES”) addressed to counsel for each of the parties in the above-captioned matter, as follows:

Party Name	Party Type	Attorney Name
Colorado Division of Water Resources	Defendant	Daniel E Steuer (CO Attorney General) Ema I.g. Schultz (CO Attorney General) Preston Vincent Hartman (CO Attorney General)
Colorado Parks And Wildlife	Defendant	Katie Laurette Wiktor (CO Attorney General) Timothy John Monahan (CO Attorney General)
David Nettles	Defendant	Daniel E Steuer (CO Attorney General) Ema I.g. Schultz (CO Attorney General) Preston Vincent Hartman (CO Attorney General)
Dick Wolfe	Defendant	Daniel E Steuer (CO Attorney General) Ema I.g. Schultz (CO Attorney General) Preston Vincent Hartman (CO Attorney General)
4m Feeders Inc	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
4m Feeders LLC	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
Carlyle James As Trustee of the Chester James Trust	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
City of Burlington	Defendant-Well Owner	Alix L Joseph (Burns Figa and Will P C) Steven M. Nagy (Burns Figa and Will P C)
City of Holyoke	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
City of Wray Colorado	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
Colorado Agriculture Preservation Assoc	Defendant-Well Owner	Bradley Charles Grasmick (Lawrence Jones Custer Grasmick LLP)
Colorado State Board Land Commissioners	Defendant-Well Owner	Virginia Marie Sciabarrasi (CO Attorney General)
David L Dirks	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
Dirks Farms Ltd	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
Don Myrna And Nathan Andrews	Defendant-Well Owner	Geoffrey M Williamson (Vranesh and Raisch)

Party Name	Party Type	Attorney Name
		Stuart B Corbridge (Vranesh and Raisch)
Happy Creek Inc	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
Harvey Colglazier	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
J And D Cattle LLC	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
James J May	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
Julie Dirks	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
Kent E Ficken	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
Lazier Inc	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
Mariane U Ortner	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
Marjorie Colglazier Trust	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
May Acres Inc	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
May Brothers Inc	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
May Family Farms	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
North Well Owners	Defendant-Well Owner	Kimbra L. Killin (Colver Killin and Sprague LLP) Russell Jennings Sprague (Colver Killin and Sprague LLP)
Protect Our Local Community's Water LLC	Defendant-Well Owner	John David Buchanan (Buchanan and Sperling, P.C.) Timothy Ray Buchanan (Buchanan and Sperling, P.C.)
Republican River Water Conservation Dist	Defendant-Well Owner	David W Robbins (Hill and Robbins PC) Peter J Ampe (Hill and Robbins PC)

Party Name	Party Type	Attorney Name
Saving Our Local Economy LLC	Defendant-Well Owner	John David Buchanan (Buchanan and Sperling, P.C.) Timothy Ray Buchanan (Buchanan and Sperling, P.C.)
Steven D Kramer	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
Thomas R May	Defendant-Well Owner	Johanna Hamburger (Carlson, Hammond & Paddock, L.L.C.) William Arthur Paddock (Carlson, Hammond & Paddock, L.L.C.)
Timothy E Ortner	Defendant-Well Owner	Alvin Raymond Wall (Alvin R Wall Attorney at Law)
Tri State Generation And Transmission As	Defendant-Well Owner	Aaron S. Ladd (Vranesh and Raisch) Justine Catherine Shepherd (Vranesh and Raisch)
Yuma Cnty Water Authority Public Improv	Defendant-Intervenor	Dulcinea Zdunska Hanuschak (Brownstein Hyatt Farber Schreck LLP) John A Helfrich (Brownstein Hyatt Farber Schreck LLP) Steven Owen Sims (Brownstein Hyatt Farber Schreck LLP)



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