

**DISTRICT COURT - CSRBA**  
**Fifth Judicial District**  
**County of Twin Falls - State of Idaho**

**JUL 15 2024**

By \_\_\_\_\_ Clerk  
 \_\_\_\_\_ Deputy Clerk

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE  
 STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

**In Re CSRBA** )  
 )  
**Case No. 49576** )  
 )  
 )  
 )  
 )  
 \_\_\_\_\_ )

**A. Subcases 95-16672 & 95-16677**

**STANDARD FORM 2  
 RESPONSE TO OBJECTION**

**(Domestic and Municipal Claims)**

*file 50 21 8 20 24  
 230 21 8 20 24*

Please print or type the following information:

**B. NAME AND ADDRESS OF THE PERSON RESPONDING**

Name: Buell Bros., Inc.  
 Address: 318 Highland Drive  
 St. Maries, Idaho 83861  
 Daytime Phone: (208) 245-3274

Name & Address of Attorney, if any:

DUNHAM & WOLFF, P.A.  
 Mariah R. Dunham (ISB# 7287)  
 722 Main Avenue  
 St. Maries, Idaho 83861  
 Phone: (208) 245-2523  
 Fax: (208) 245-4392

**C. NAME AND ADDRESS OF PERSON WHO FILED THE OBJECTION TO  
 WHICH YOU ARE RESPONDING**

Name: Raul R. Labrador  
 Attorney General  
 State of Idaho

Address: PO Box 83720  
 Boise, Idaho 83720-0010

**D.** I am responding to the Objections to the following elements or general provision. (Please check the appropriate box(es)).

1.  **Name and Address**
2.  **Source**
3.  **Quantity**
4.  **Priority Date**
5.  **Point of Diversion**
6.  **Instream Flow Beginning and End Point**
7.  **Purpose(s) of Use**
8.  **Period of Year**
9.  **Place of Use**
10.  **General Provisions**
11.  **Recommendation:**
  - This water right should not exist.
  - This water right was not recommended, but should be recommended with the elements described above.

DATED this 11 day of July, 2024.

DUNHAM & WOLFF, P.A.

By: Mariah R. Dunham  
MARIAH R. DUNHAM, ISB# 7287  
Attorney for Buell Bros, Inc.

**CERTIFICATE OF MAILING**

I certify that on July 11, 2024, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court  
Coeur d'Alene-Spokane River Basin Adjudication  
253 Third Avenue North  
PO Box 2707  
Twin Falls, ID 83303-2707

2. One copy to the claimant of the water right at the following address:

Name: United States of America, as trustee on behalf of the Coeur d'Alene Tribe and on behalf of the Coeur d'Alene Indian Reservation acting through the Regional Director, Northwest Region

Address: Department of the Interior Bureau of Indian Affairs  
911 NE 11<sup>th</sup> Avenue, Portland, Oregon 97232

3. Copies to:

CLERK OF THE DISTRICT COURT (X) U.S. Mail, Postage Prepaid  
Coeur d'Alene-Spokane River Basin Adjudication ( ) Hand Delivered  
253 Third Avenue North ( ) Overnight Mail  
PO Box 2707  
Twin Falls, Idaho 83303-2707

IDWR Document Depository (X) U.S. Mail, Postage Prepaid  
PO BOX 83720 ( ) Hand Delivered  
Boise, ID 83720-0098 ( ) Overnight Mail

DIRECTOR OF IDWR (X) U.S. Mail, Postage Prepaid  
PO Box 83720 ( ) Hand Delivered  
Boise, Idaho 83720-0098 ( ) Overnight Mail

CHIEF, NATURAL RESOURCES DIVISION (X) U.S. Mail, Postage Prepaid  
OFFICE OF THE ATTORNEY GENERAL ( ) Hand Delivered  
STATE OF IDAHO ( ) Overnight Mail  
PO BOX 83720  
BOISE, IDAHO 83720-0010

US DEPARTMENT OF JUSTICE  
ENV & NATL' RESOURCES DIV.  
550 West Fort Street, MSC 033  
Boise, Idaho 83724

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email: [mattsmith@caci.com](mailto:mattsmith@caci.com)

VANESSA BOYD WILLARD  
KATHERINE M. KANE  
DANIEL F. McCARL  
US DEPARTMENT OF JUSTICE, ENRD  
INDIAN RESOURCES SECTION  
Denver, Colorado 80202

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email: [vanessa.willard@usdoj.gov](mailto:vanessa.willard@usdoj.gov)  
[daniel.mccarl@usdoj.gov](mailto:daniel.mccarl@usdoj.gov)  
[katherine.kane@usdoj.gov](mailto:katherine.kane@usdoj.gov)

BRAD GRENHAM  
DEPT. OF INTERIOR SOLICITOR'S OFFICE  
601 SW 2<sup>nd</sup> Avenue Suite 1950  
Portland, Oregon 97204

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email

ERIC VAN ORDEN  
OFFICE OF LEGAL COUNSEL  
COEUR D'ALENE TRIBE  
PO Box 408  
Plummer, Idaho 83851

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email: [eric.vanorden@cdatribe-nsn.gov](mailto:eric.vanorden@cdatribe-nsn.gov)

VANESSA L. RAY-HODGE  
Sonosky, Chambers, Sachse, Enderson & Perry  
LLP  
9900 SW Wilshire Avenue, Suite 240  
Portland, Oregon 97005

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email: [vrayhodge@abqsonosky.com](mailto:vrayhodge@abqsonosky.com)

ALBERT P BARKER  
MARTIN LAW  
1010 W Jefferson St Ste 102  
Boise, Idaho 83702

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email: [abarker@martenlaw.com](mailto:abarker@martenlaw.com)

MICHAEL P. LAWRENCE  
GIVENS PURSLEY LLP  
601 W. Bannock Street  
PO Box 2720  
Boise, Idaho 83701-2720

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email: [mpl@givenspursley.com](mailto:mpl@givenspursley.com)

CANDICE M MCHUGH  
MCHUGH BROMLEY PLLC  
380 S 4<sup>th</sup> Street Ste 103  
Boise, Idaho 83702

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email: [cmchugh@mchugfhbromley.com](mailto:cmchugh@mchugfhbromley.com)

NORMAN M SEMANKO  
PARSONS BEHLE & LATIMER  
800 W. Main Street, Suite 1300  
Boise, Idaho 83702

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email:  
[nsemanko@parsonsbehle.com](mailto:nsemanko@parsonsbehle.com)

CHRIS M BROMLEY  
MCHUGH BROMLEY PLLC  
380 S 4<sup>th</sup> Street Ste 103  
Boise, Idaho 83702

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Email:  
[cbromley@mchughbromley.com](mailto:cbromley@mchughbromley.com)

Date: 7-11-24

  
\_\_\_\_\_  
MARIAH R. DUNHAM