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Attorneys for Applicant

IN THE OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of the Application for a
Permit to Transport water Out of the State

Permit No. 33-96790

Applicant: Wind River Resources, L.L.C.

No. 07A-TR001-DWR

**APPLICANT'S RESPONSE TO
MOTIONS TO INTERVENE BY
BRIGHAM YOUNG UNIVERSITY AND
BEAVER DAM WATER COMPANY,
INC.**

(Assigned to the Honorable Thomas
Shedden)

The Applicant, Wind River Resources, LLC (“Wind River”) objects to the Motions to Intervene filed by Brigham Young University and Beaver Dam Water Company, Inc. on the same grounds and for the same reasons submitted as objections to the Motion to Intervene filed by Great American Land, LLC. As set forth in the Response to Great American’s Motion, allowing intervention as “parties” by “Interested Persons” at this time is both untimely and contrary to the provisions of ARS § 45-291 through 45-294 and would present insurmountable procedural due process road blocks to a fair hearing for the Applicant.

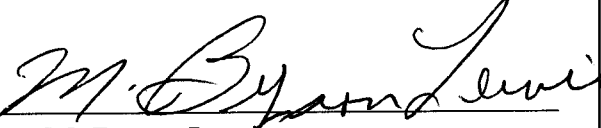
For the reasons set forth above, and in the applicant’s Response to Great America’s Motion to Intervene, it is respectfully requested that the Hearing Officer deny the Motions to Intervene filed by

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Brigham Young University and Beaver Dam Water Company and any other Motions to Intervene that may be filed by any other “interested person”.

Dated this 26th day of January, 2007.

SALMON, LEWIS & WELDON, P.L.C.

By 

M. Byron Lewis
Maxine M. Becker
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Electronically Filed and Served via
TR001@azoah.com this 26th day of January, 2007
with the Office of
Administrative Hearings