



November 3, 2008

**HAND DELIVERED**

Jerry D. Olds, P.E.  
Utah State Engineer  
Utah Division of Water Rights  
1594 West North Temple, #220  
Salt Lake City, Utah 84116-3156

Re: Comment on R655-16. Administrative Procedures for Defining  
Beneficial Uses for Supplemental Water Rights

Dear Mr. Olds:

Thank you for the opportunity to comment on your proposed rule. Sandy City recognizes and appreciates your responsibility to quantify a particular water right's beneficial use when it is used supplementally with other water rights.

It is our understanding that you intend to exempt municipalities from filing a Statement of Group Contribution in conjunction with change applications and other administrative actions. We would like to see this exception definitively expressed in the rule.

Sandy City participates with the Utah Water Coalition and shares its common concerns. As such, we also affirm and incorporate those points and concerns expressed by it, and other Utah municipalities, in their respective letters commenting on this rule.

Again, thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Patrick R. Casaday".

Patrick R. Casaday  
Attorney for Sandy City

**RECEIVED**

NOV 03 2008

TG

WATER RIGHTS  
SALT LAKE