



MABEY WRIGHT & JAMES PLLC

ATTORNEYS AT LAW

175 SOUTH MAIN, SUITE 1330
SALT LAKE CITY, UTAH 84111

John H. Mabey, Jr.

TELEPHONE: (801) 359-3663

www.mwjlaw.com

jmabey@mwjlaw.com

FACSIMILE: (801) 359-3673

June 13, 2014

Kent L. Jones, P.E.
State Engineer
Utah Division of Water Rights
1594 West North Temple Suite 220
P.O. Box 146300
Salt Lake City, UT 84114-6300

Re: Lawful Storage in Three Creeks Reservoir

Dear Mr. Jones:

We represent Kents Lake Reservoir Company. You received a letter from counsel for Rocky Ford Irrigation Company dated June 11, 2014, alleging unlawful storage of water in Three Creeks Reservoir. A more detailed response will follow, but for now please be advised that the water in Three Creeks Reservoir was lawfully stored and there is no basis on which Rocky Ford may call on this water.

Great harm will come to shareholders of Kents Lake if they lose the ability to irrigate with the stored water. Please do not order the release of water stored in Three Creeks. Such an immediate response is not warranted given the recent controversies regarding storage rights on the Beaver River which are now in court and moving to trial.

Sincerely,

MABEY WRIGHT & JAMES, PLLC

John H. Mabey, Jr.

Cc via email: Jared Manning
David Wright
Daniel A. Jensen
Mike Robinson

Julie Valdes
Justin Wayment
Matthew Jensen
Jerry Olds

JHM/ma

RECEIVED
JUN 17 2014
WATER RIGHTS
SALT LAKE

DC