

ARIZONA DEPARTMENT OF WATER RESOURCES
BEFORE THE DIRECTOR

In the Matter of the Petition to Designate the San Simon Valley Sub-basin as an Irrigation Non Expansion Area	Opposition to Petition
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Non-Petitioners Samara Farming Enterprises, Inc. (“Samara Farms”) and Silverado Farms, LLC (“Silverado”), by and through their undersigned counsel, hereby submit their opposition to the February 6, 2015 Petition to establish an Irrigation Non Expansion Area in the San Simon Valley Sub-basin and the supplements to the Petition submitted on March 4-9, 2015 (collectively, the “Petition”). Samara Farms and Silverado are landowners¹ and irrigation users of groundwater within the San Simon Valley Sub-basin.

Samara Farming Enterprises, Inc.

By 

Print name: GENERAL CHIMA
Its: Authorized Representative
c/o Lee Storey, the Storey Lawyers PLC
6515 N. 12th Street, Phoenix, Arizona 85014

Silverado Farms, LLC

By 

Print name: GENERAL CHIMA
Its: Authorized Representative
c/o Lee Storey, the Storey Lawyers PLC
6515 N. 12th Street, Phoenix, Arizona 85014

¹ Samara Farms and Silverado own the following parcels within the San Simon Valley Sub-basin: 302-44-015-6, 302-44-016-9, 302-44-017-2, and 302-44-033-8.

This Opposition is in addition to the Petitions reflecting opposition submitted to and received by the Arizona Department of Water Resources on March 26, 2015 and March 31, 2015.²

Samara Farms and Silverado oppose the Petition because the San Simon Valley Sub-basin does not satisfy the statutory requirements for establishment of an Irrigation Non Expansion Area. Among other deficiencies, the Petitioners have not, and cannot, demonstrate that there is insufficient groundwater to provide a reasonably safe supply for irrigation of the cultivated lands in the area at current rates of withdrawal.

Samara Farms and Silverado will be represented by Lee Storey and Sara Ransom of the Storey Lawyers, PLC at the May 16, 2015 Public Hearing, and request that the Department provide their representatives the opportunity to comment and present evidence during the hearing.

DATED this 12th day of May, 2015.

THE STOREY LAWYERS PLC



Lee A. Storey

Sara V. Ransom, Of Counsel

6515 N. 12th Street, Suite C

Phoenix, AZ 85014

Attorneys for Samara Farming Enterprises, Inc., Silverado Farms, LLC, Kimberly Klump and John Klump

CERTIFICATE OF SERVICE

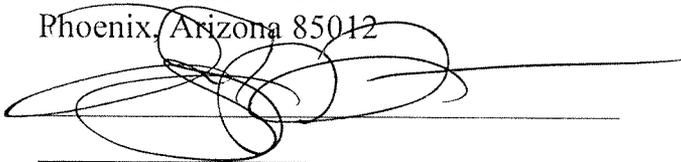
I certify that on this 12th day of May, 2015, the original and one copy of this document was hand delivered to:

Arizona Department of Water Resources

Attention: Director Thomas Buschatzke

3550 N. Central Avenue

Phoenix, Arizona 85012



² Additional non-petitioner landowners and irrigation users of groundwater represented by the Storey Lawyers PLC—Kimberly Klump and John Klump—previously submitted their objections via the Petition received by the Department on March 31, 2015.