

IN THE OFFICE OF THE STATE ENGINEER OF THE STATE OF NEVADA

IN THE MATTER OF APPLICATION NUMBER 54027  
FILED BY LAS VEGAS VALLEY WATER DISTRICT  
ON OCTOBER 17, 1989, TO APPROPRIATE THE  
WATERS OF UNDERGROUND AND SURFACE

PROTEST

Comes now WILLIAM R. COFFMAN  
Printed or typed name of protestant  
whose post office address is P. O. BOX 9, BAKER, NEVADA 89311  
Street No. or P.O. Box, City, State and Zip Code  
whose occupation is RETIRED, and protests the granting  
of Application Number 54027, filed on OCTOBER 17, 1989  
by LAS VEGAS VALLEY WATER DISTRICT  
Printed or typed name of applicant  
to appropriate the  
waters of UNDERGROUND AND SURFACE  
Underground or name of stream, lake, spring or other source  
situated in WHITE PINE  
County, State of Nevada, for the following reasons and on the following grounds, to wit:

SEE ATTACHMENT

THEREFORE the protestant requests that the application be denied  
(Denied, issued subject to prior rights, etc., as the case may be)  
and that an order be entered for such relief as the State Engineer deems just and proper.

Signed *William R. Coffman*  
Agent or protestant  
WILLIAM R. COFFMAN  
Printed or typed name, if agent  
Address P. O. BOX 9  
Street No. or P.O. Box No.  
BAKER, NEVADA 89311  
City, State and Zip Code No.

Subscribed and sworn to before me this 27th day of July, 1990

*Notary Public*  
Notary Public  
State of NV  
County of White Pine

JUSTICE OF THE PEACE  
BAKER TOWNSHIP  
BAKER, NV 89311

510 FILING FEE MUST ACCOMPANY PROTEST. PROTEST MUST BE FILED IN DUPLICATE.  
ALL COPIES MUST CONTAIN ORIGINAL SIGNATURE.

BY LAS VEGAS VALLEY WATER DISTRICT

The appropriation of this water when added to the already approved appropriations and dedicated users in this basin will exceed the safe yield of the basin. Appropriation and use of this magnitude will lower the water table and degrade the quality of water from existing wells, cause negative hydraulic gradient influences, further cause other negative impacts and will adversely affect existing rights adverse to the public interest.

This Application is one of over 140 applications filed by the Las Vegas Valley Water District seeking a combined appropriation of over 860,000 acre-feet of ground and surface water for municipal use in the Las Vegas Valley Artesian Basin. Diversion and export of such a quantity of water will deprive the county and area of origin of the water needed for its environment and economic well being and will unnecessarily destroy environmental, ecological, scenic and recreational values that the State holds in trust for all its citizens.

The granting or approving of the subject Application in the absence of comprehensive planning, including but not limited to environmental impact considerations, socioeconomic impact considerations, and water resource plan consideration for the general Las Vegas Valley area such as has been required by the Public Service Commission of private purveyors of water, is detrimental to the public welfare and interest.

The granting or approving of the subject Application in the absence of comprehensive water resource development planning, including but not limited to, environmental impacts socioeconomic impacts, and long term impacts on the water resource, threatens to prove detrimental to the public interest.

The granting or approval of the above-referenced Application would be detrimental to the public interest in that it individually and cumulatively with other applications of the water exploration project would:

- a. Likely jeopardize the continued existence of endangered and threatened species recognized under the Endangered Species Act and related state statutes;
- b. Prevent or interfere with the conservation of those threatened or endangered species;
- c. Take or harm those endangered species; and
- d. Interfere with the purpose for which the Federal lands are managed under Federal statutes including, but not limited to, the Federal Land Use Policy Act of 1976.

The approval of the subject Application will sanction and enhance the willful waste of water allowed, if not encouraged, by the Las Vegas Valley Water District.

The subject Application seeks to develop the water resources of, and transport water across, lands of the United States under the jurisdiction of the United States Department of Interior, Bureau of Land Management. This Application should be denied because the Las Vegas Valley Water District has not obtained right-of-way for water development on public lands and the transportation of water from the proposed point of diversion to the service area of the Las Vegas Valley Water District in Clark County.

This Application should be denied because it individually and cumulatively will increase the waste of water and lack of effective conservation efforts in the Las Vegas Valley Water District service area.

The subject Application should be denied because it individually and cumulatively with other Applications will exceed the safe yield of this basin thereby adversely affecting phreatophytes and create air contamination and air pollution in violation of State and Federal Statutes, including but not limited to, the Clean Air Act and Chapter 445 of the Nevada Revised Statutes.

In as much as a water extraction and trans-basin conveyance project of this magnitude has never been considered by the State Engineer, it is therefore impossible to anticipate all potential adverse affects without further study. Accordingly, the protestant reserves the right to amend the subject protest to include such issues as they develop as a result of further study.