

IN THE SUPREME COURT OF THE STATE OF NEVADA

ADAM SULLIVAN, P.E., NEVADA STATE
ENGINEER, DIVISION OF WATER
RESOURCES, DEPARTMENT OF
CONSERVATION AND NATURAL
RESOURCES,

Appellant,

vs.

LINCOLN COUNTY WATER DISTRICT;
VIDLER WATER COMPANY, INC.;
COYOTE SPRINGS INVESTMENT, LLC;
NEVADA COGENERATION ASSOCIATES
NOS. 1 AND 2; APEX HOLDING
COMPANY, LLC; DRY LAKE WATER,
LLC; GEORGIA-PACIFIC GYPSUM, LLC;
REPUBLIC ENVIRONMENTAL
TECHNOLOGIES INC.; SIERRA PACIFIC
POWER COMPANY d/b/a NV ENERGY;
NEVADA POWER COMPANY d/b/a NV
ENERGY; THE CHURCH OF JESUS
CHRIST OF LATTER-DAY SAINTS;
MOAPA VALLEY WATER DISTRICT;
WESTERN ELITE ENVIRONMENTAL,
INC.; BEDROC LIMITED, LLC; CITY OF
NORTH LAS VEGAS; AND LAS VEGAS
VALLEY WATER DISTRICT,

Respondents. /

SOUTHERN NEVADA WATER
AUTHORITY,

Appellant,

vs.

LINCOLN COUNTY WATER DISTRICT;
VIDLER WATER COMPANY, INC.;

SUPREME COURT NO. 84739

District Court Case No. 2022-03-34 p.m.
(Consolidated with Supreme
Court Cases 84741, 84742 and
84809)
Electronically Filed
Jun 21 2022 03:34 p.m.
Elizabeth A. Brown,
Clerk of Supreme Court

SUPREME COURT NO. 84741

(Consolidated with Supreme
Court Cases 84739, 84742 and
84809)

COYOTE SPRINGS INVESTMENT, LLC;
NEVADA COGENERATION ASSOCIATES
NOS. 1 AND 2; APEX HOLDING
COMPANY, LLC; DRY LAKE WATER,
LLC; GEORGIA-PACIFIC GYPSUM, LLC;
REPUBLIC ENVIRONMENTAL
TECHNOLOGIES INC.; SIERRA PACIFIC
POWER COMPANY d/b/a NV ENERGY;
NEVADA POWER COMPANY d/b/a NV
ENERGY; THE CHURCH OF JESUS
CHRIST OF LATTER-DAY SAINTS;
MOAPA VALLEY WATER DISTRICT;
WESTERN ELITE ENVIRONMENTAL,
INC.; BEDROC LIMITED, LLC; CITY OF
NORTH LAS VEGAS; AND LAS VEGAS
VALLEY WATER DISTRICT,

Respondents. /

CENTER FOR BIOLOGICAL DIVERSITY,

Appellant,

vs.

LINCOLN COUNTY WATER DISTRICT;
VIDLER WATER COMPANY, INC.;
COYOTE SPRINGS INVESTMENT, LLC;
NEVADA COGENERATION ASSOCIATES
NOS. 1 AND 2; APEX HOLDING
COMPANY, LLC; DRY LAKE WATER,
LLC; GEORGIA-PACIFIC GYPSUM, LLC;
REPUBLIC ENVIRONMENTAL
TECHNOLOGIES INC.; SIERRA PACIFIC
POWER COMPANY d/b/a NV ENERGY;
NEVADA POWER COMPANY d/b/a NV
ENERGY; THE CHURCH OF JESUS
CHRIST OF LATTER-DAY SAINTS;
MOAPA VALLEY WATER DISTRICT;
WESTERN ELITE ENVIRONMENTAL,
INC.; BEDROC LIMITED, LLC; CITY OF

SUPREME COURT NO. 84742

(Consolidated with Supreme
Court Cases 84739, 84741 and
84809)

NORTH LAS VEGAS; AND LAS VEGAS VALLEY WATER DISTRICT,

Respondents. /

MUDDY VALLEY IRRIGATION COMPANY,

Appellant,

vs.

LINCOLN COUNTY WATER DISTRICT; VIDLER WATER COMPANY, INC.; COYOTE SPRINGS INVESTMENT, LLC; NEVADA COGENERATION ASSOCIATES NOS. 1 AND 2; APEX HOLDING COMPANY, LLC; DRY LAKE WATER, LLC; GEORGIA-PACIFIC GYPSUM, LLC; REPUBLIC ENVIRONMENTAL TECHNOLOGIES INC.; SIERRA PACIFIC POWER COMPANY d/b/a NV ENERGY; NEVADA POWER COMPANY d/b/a NV ENERGY; THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS; MOAPA VALLEY WATER DISTRICT; WESTERN ELITE ENVIRONMENTAL, INC.; BEDROC LIMITED, LLC; CITY OF NORTH LAS VEGAS; AND LAS VEGAS VALLEY WATER DISTRICT,

Respondents. /

SUPREME COURT NO. 84809
(Consolidated with Supreme Court Cases 84739, 84741 and 84742)

COYOTE SPRINGS INVESTMENT, LLC’S JOINDER TO LINCOLN COUNTY WATER DISTRICT’S AND VIDLER WATER COMPANY, INC.’S RESPONSE TO APPELLANT STATE ENGINEER’S DOCKETING STATEMENT

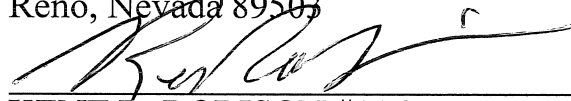
Respondent Coyote Springs Investment, LLC’s (“CSI”), through its counsel of record, joins Lincoln County Water District’s and Vidler Water Company, Inc.’s response to Appellant State Engineer’s Docketing Statement. CSI agrees that the

State Engineer has improperly identified as in issue in this appeal whether substantial evidence supports Order 1309 when the District Court did not reach that issue below.

Affirmation: Pursuant to NRS 239B.030, the undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

DATED this 21st day of June, 2022.

ROBISON, SHARP, SULLIVAN & BRUST
71 Washington Street
Reno, Nevada 89503



KENT R. ROBISON #1167
HANNAH E. WINSTON #14520
MICHAELA G. DAVIES #15205

IN ASSOCIATION WITH:

BRADLEY J. HERREMA #10368
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106

WILLIAM L. COULTHARD #3927
COULTHARD LAW
840 South Ranch Drive, #4-627
Las Vegas, Nevada 89106

EMILIA K. CARGILL #6493
3100 State Route 168
P.O. Box 37010
Coyote Springs, Nevada 89037
Attorneys for Respondent
Coyote Springs Investment, LLC

CERIFICATE OF SERVICE

I certify that on the 21st day of June 2022, I served a copy of **COYOTE SPRINGS INVESTMENT, LLC'S JOINDER TO LINCOLN COUNTY WATER DISTRICT'S AND VIDLER WATER COMPANY, INC.'S RESPONSE TO APPELLANT STATE ENGINEER'S DOCKETING STATEMENT** upon all counsel of record:

BY MAIL: I placed a true copy thereof enclosed in a sealed envelope addressed as follows:

BY FACSIMILE: I transmitted a copy of the foregoing document this date via telecopier to the facsimile number shown below:

BY ELECTRONIC SERVICE: by electronically filing and serving the foregoing document with the Nevada Supreme Court's electronic filing system:

PAUL G. TAGGART, ESQ.
TIMOTHY D. O'CONNOR, ESQ.
Taggart & Taggart, Ltd.
108 North Minnesota Street
Carson City, NV 89703
Email: paul@legaltnt.com; tim@legaltnt.com
Attorneys for LVVWD and SNWA

STEVEN C. ANDERSON, ESQ.
Las Vegas Valley Water District
1001 S. Valley View Blvd.
Las Vegas, NV 89153
Email: Sc.anderson@lvvwd.com
Attorneys for LVVWD and SNWA

JAMES N. BOLOTIN, ESQ.
LAENA ST-JULES, ESQ.
KIEL B. IRELAND, ESQ.
Office of the Attorney General
100 North Carson
Carson City, NV 89701
Email: jbolotin@ag.nv.gov; lstjules@ag.nv.gov; kireland@ag.nv.gov
Attorneys for Respondent State Engineer

BRADLEY J. HERREMA, ESQ.
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106
Email: bherrema@bhfs.com
Attorneys for Coyote Springs Investment, LLC

WILLIAM L. COULTHARD, ESQ.
COULTHARD LAW
840 South Ranch Drive, #4-627
Las Vegas, NV 89106
Email: wlc@coulthardlaw.com
Attorneys for Coyote Springs Investment, LLC

EMILIA K. CARGILL, ESQ.
3100 State Route 168
P.O. Box 37010
Coyote Springs, NV 89037
Email: emilia.cargill@wingfieldnevadagroup.com
Attorneys for Coyote Springs Investment, LLC

GREGORY H. MORRISON, ESQ.
Parson Behle & Latimer
50 West Liberty Street, Suite 750
Reno, NV 89501
Email: gmorrison@parsonsbehle.com
Attorneys for Moapa Valley Water District

CHRISTIAN T. BALDUCCI, ESQ.
Marquis Aurbach Coffing
10001 Park Run Drive
Las Vegas, NV 89145
Email: cbalducci@maclaw.com
Attorneys for Apex Holding Company, LLC and Dry Lake Water, LLC

SYLVIA HARRISON, ESQ.
LUCAS FOLETTA, ESQ.
SARAH FERGUSON, ESQ.
McDonald Carano LLP
100 W. Liberty Street, 10th Floor
Reno, NV 89501
Email: sharrison@mcdonaldcarano.com
lfoletta@mcdonaldcarano.com
sferguson@mcdonaldcarano.com
*Attorneys for Georgia-Pacific Gypsum LLC
and Republic Environmental Technologies, Inc.*

LISA BELENKY, ESQ.
Center for Biological Diversity
1212 Broadway, #800
Oakland, CA 94612
Email: lbelenky@biologicaldiversity.org
Attorneys for Center for Biological Diversity

SCOTT LAKE, ESQ.
Center for Biological Diversity
P.O. Box 6205
Reno, NV 89513
Email: slake@biologicaldiversity.org
Attorney for Center for Biological Diversity

JULIE CAVANAUGH-BILL, ESQ.
Cavanaugh-Bill Law Offices, LLC
Henderson Bank Building
401 Railroad Street, Suite 307
Elko, NV 89801
Email: julie@cblawoffices.org
Attorneys for Center for Biological Diversity

ROBERT A. DOTSON, ESQ.
JUSTIN C. VANCE, ESQ.
Dotson Law
5355 Reno Corporate Drive, Suite #100
Reno, NV 89511
Email: rdotson@dotsonlaw.legal / jvance@dotsonlaw.legal
Attorneys for Muddy Valley Irrigation Company

STEVEN D. KING, ESQ.
227 River Road
Dayton, NV 89403
Email: kingmont@charter.net
Attorneys for Muddy Valley Irrigation Company

FRANCIS C. FLAHERTY, ESQ.
Dyer Lawrence, LLP
2805 Mountain Street
Carson City, NV 89703
Email: fflaherty@dyerlawrence.com / smatuska@dyerlawrence.com
Attorneys for Nevada Cogeneration Association Nos. 1 and 2

SEVERIN A. CARLSON, ESQ.
Kaempfer Crowell
50 W. Liberty Street, Suite 700
Reno, NV 89501
Email: scarlson@kcnvlaw.com
Attorneys for The Church of Jesus Christ of Latter-Day Saints

JUSTINA A. CAVIGLIA, ESQ.
MICHAEL D. KNOX, ESQ.
Nevada Energy
6100 Neil Road
Reno, NV 89510
Email: jcaviglia@nvenergy.com; mknnox@nvenergy.com
*Attorneys for Sierra Pacific Power Company, dba NV Energy
Nevada Power Company, dba NV Energy*

THERESE A. URE, ESQ.
LAURA A. SCHROEDER, ESQ.
CAITLIN R. SKULAN, ESQ.
Schroeder Law Offices, P.C.
10615 Double R Blvd., Suite 100
Reno, NV 89521
Email: counsel@water-law.com
Attorneys for Bedroc and City of North Las Vegas

KAREN A. PETERSON, ESQ.
Allison MacKenzie, Ltd.
402 N. Division Street
Carson City, NV 89703
Email: kpeterson@allisonmackenzie.com /
nfontenot@allisonmackenzie.com
*Attorneys for Lincoln County Water District and Vidler Water
Company, Inc.*

DYLAN V. FREHNER, ESQ.
Lincoln County District Attorney
P.O. Box 60
Pioche, NV 89403
Email: dfrehner@lincolncountynv.gov
*Attorneys for Lincoln County Water District and Vidler Water
Company, Inc.*

WAYNE O. KLOMP, ESQ.
Great Basin Law
1783 Trek Trail
Reno, NV 89521
Email: wayne@greatbasinlawyer.com
*Attorneys for Lincoln County Water District and Vidler Water
Company, Inc.*

DATED: This 21st day of June, 2022.

/s/Mary Carroll Davis
Mary Carroll Davis
An Employee of Robison, Sharp, Sullivan & Brust