

**William G. Gibbs**LAW OFFICES

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Natural Resources  
Water Rights

November 3, 2008

Re Comments on R55-16, Supplemental Rights

I have attended a number of meetings regarding the rule regarding Supplemental Water Rights. After considerable thought I believe the comments submitted by the Utah Water Coalition are exactly right. I have worked in the water rights field representing all kinds of Special Improvement Districts, ditch companies and individuals with water rights. I do not believe the rule as proposed would be beneficial to any of them and most certainly would be detrimental.

Respectfully submitted,