

OCC

**MINASIAN, MEITH,
SOARES, SEXTON &
COOPER, LLP**

ATTORNEYS AT LAW
A Partnership Including Professional Corporations

1681 BIRD STREET
P.O. BOX 1679
OROVILLE, CALIFORNIA 95965-1679

Writer's e-mail: dcooper@minasianlaw.com

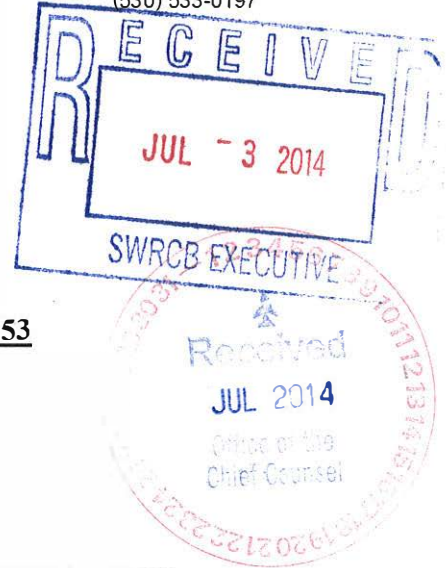
PAUL R. MINASIAN, INC.
JEFFREY A. MEITH
M. ANTHONY SOARES
DUSTIN C. COOPER
EMILY E. LaMOE
PETER C. HARMAN

TELEPHONE:
(530) 533-2885

FACSIMILE:
(530) 533-0197

WILLIAM H. SPRUANCE,
Retired

MICHAEL V. SEXTON,
Retired



July 2, 2014

Via California Overnight – Tracking No. D10010695036553

Thomas Howard, Executive Director
State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814

**Re: REQUEST FOR HEARING OF STANFORD VINA RANCH IRRIGATION
COMPANY CONCERNING ENFORCEMENT ACTION ENF001023 AND
ORDER WR 201-00XX-DWR (DRAFT CEASE AND DESIST ORDER IN THE
MATTER OF UNAUTHORIZED DIVERSION AND VIOLATION OF
EMERGENCY REGULATIONS FOR CURTAILMENT OF DIVERSIONS DUE
TO INSUFFICIENT FLOW FOR SPECIFIC FISHERIES)**

TO WHOM IT MAY CONCERN:

Notice is hereby given by Stanford Vina Ranch Irrigation Company and its shareholders under subdivision (b) of Water Code section 1834 that it requests a hearing in the above-reference matter. The draft CDO is inappropriate because it was issued on the basis of emergency regulations adopted in violation of the law by the State Water Board and its staff. The reasons why the emergency regulations are invalid are explained more fully in Stanford Vina's Petition for Reconsideration (including exhibits) transmitted herewith.

Additionally, the State Water Board may only issue a cease and desist order upon a determination that a person is violating or threatening to violate any requirement described in subdivision (d) of Water Code section 1831, none of which are implicated in this matter. Stanford Vina's shareholders own adjudicated riparian and pre-1914 water rights and such rights are not subject to Division 2 of the California Water Code. (Water Code §§ 1831, subd. (e), 1052, subd. (a); cf. Water Code § 275 [located in Part 1 of the Water Code authorizing participation in proceedings or actions before executive, legislative, and judicial agencies to prevent waste or unreasonable use of water "in this state"].)

Very truly yours,

**MINASIAN, MEITH, SOARES, SEXTON
& COOPER, LLP**

DUSTIN C. COOPER, Attorneys for Stanford Vina Ranch
Irrigation Company