

KIMBERLY JUNKER, CANDICE	)	
BRANDAU LARSON, and KATHY	)	No. CVCV066246
CARTER,	)	
	)	
Petitioners,	)	
	)	AFFIDAVIT OF KIMBERLY JUNKER
vs.	)	
	)	
IOWA DEPARTMENT OF NATURAL	)	
RESOURCES,	)	
	)	
Respondent.	)	

Kimberly Junker, being first duly sworn on oath, states as follows:

1. My name is Kimberly Junker and I live on a farm in Grundy County, Iowa, about one mile from Butler County. My drinking water is from a private well on my property.

2. I have confirmed that my drinking water comes from the Devonian Limestone aquifer.

3. I have reviewed the Motion to Dismiss filed in this case by the Iowa Department of Natural Resources. This affidavit is in support of a resistance to that motion.

4. After reviewing the Motion to Dismiss I understand that a notice was published in the New Hampton Tribune on May 4, 2023, advising of the IDNR's decision to grant a permit for withdrawal of 55.9 million gallons of water per year from the Devonian Limestone aquifer. The New Hampton Tribune is not generally distributed to people in Grundy or Butler County, so I had no way of knowing about the IDNR proposal to issue a permit. If I had known I would have commented and would have been aware of the decision to issue the permit and the IDNR rule on appealing that decision to the Iowa Environmental Protection Commission.

5. The first I learned of the water use was in a meeting of affected landowners on the Summit pipeline route, probably sometime in September. With me living over here between Parkersburg and New Hartford, there is no way I would have read about it in the New Hampton newspaper (no public notice would have been in our local paper). Thank goodness for people who discovered the water use permitting, the sneaky underhanded way that Summit tried to hide it and the way that the DNR handed it to them.

6. Based on these facts, I do not believe I had an adequate administrative remedy to challenge the issuance of the water withdrawal permit granted to Lawler SCS Capture LLC.

7. I certify under penalty of perjury and pursuant to the laws of the State of Iowa that the foregoing is true and correct to the best of my knowledge and belief.

Dated: Oct. 31, 2023.

*Kimberly Junker*  
KIMBERLY JUNKER