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Attorneys for Minidoka Irrigation
District

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Gooding, Idaho 83330
Telephone: (208) 934-8872
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Attorneys for A&B Irrigation District,
Burley Irrigation District, Milner Irrigation
District, North Side Canal Company, and
Twin Falls Canal Company

Attorneys for American Falls
Reservoir District #2

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	Subcase Nos. See Exhibit A
	)	
Case No. 39576	)	MOTION TO FILE LATE OBJECTIONS
	)	OR ALTERNATIVELY TO PARTICIPATE
_____	)	

COME NOW, American Falls Reservoir District #2, A&B Irrigation District, Burley Irrigation District, Milner Irrigation District, Minidoka Irrigation District, North Side Canal Company, and Twin Falls Canal Company ("Surface Water Coalition" or "Coalition"), parties in the SRBA, pursuant to SRBA Administrative Order #1 ("AO1") and the Idaho Rules of Civil Procedure, and move this Court for an Order Granting Motion to File Late Objections, or

**MOTION TO FILE LATE OBJECTIONS OR ALTERNATIVELY
TO PARTICIPATE**

alternatively, for an Order Granting Motion to Participate in the above-entitled subcases. The reasons for the motion are set forth below.

INTRODUCTION

The Coalition seeks to file late objections to several “ground water recharge” claims filed in Basin 21, similar to claims the Coalition objected to in Basin 22 on July 25, 2007. The claims seek to divert water for “ground water recharge” during the irrigation storage season, a time when the Coalition stores water for its downstream storage water rights. The Coalition is concerned about the claimed basis for these rights as well, i.e. “decreed”. The Coalition meets the standard to file late objections, or alternatively, to participate in these subcases as provided by AO1 and the Idaho Rules of Civil Procedure.

STANDARD OF REVIEW

In the *Memorandum Decision and Order on Challenge* (Subcase Nos. 47-16433 *et al*), Presiding Judge Melanson described the standard of review for filing a late objection:

In subcases *for which partial decrees have not been entered*, the legal standard for filing a late objection to a water right claim in the SRBA has been historically determined pursuant to the standard set forth in *AO1* for filing late claims. [citation omitted]. *AO1* does not expressly provide a standard for reviewing late objections. A motion to file a late claim is determined pursuant to I.R.C.P. 55(c), which provides the standard for setting aside the entry of a default. *Id.*, see *AO1* § 4d(2)(d) (late claims reviewed under I.R.C.P. 55(c) criteria) and (k) leave to amend a notice of claim shall be freely given when justice so requires). In the *A.L. Cattle* subcase, this Court held that the I.R.C.P. 55(c) standard should be applied to late objections to which partial decrees have not been entered, rather than the I.R.C.P. 60(b) standard.

In determining whether to set aside the entry of a default under I.R.C.P. 55(c), Idaho Courts apply a “good cause” for untimeliness standard. I.R.C.P. 55(c). The “good cause” standard is a more lenient threshold than the Rule 60(b) standard. *McFarland v. Curtis*, 123 Idaho at 935, 854 P.2d at 279. The I.R.C.P. 55(c) good cause standard takes into account the following factors:

- 1) whether the default was willful;
- 2) whether setting aside the judgment would prejudice the opponent.
- 3) as with a Rule 60(b) motion, whether a meritorious position has been presented.

Memorandum Decision and Order on Challenge at 5-6 (March 22, 2005) (“*Bedke I*”).

In doubtful cases, relief should be granted to reach a judgment on the merits. *Bedke I* at 10. This is because default judgments are disfavored. See *Order on Motion to Set Aside Partial Decrees and File Late Objections*, Subcase Nos. 65-07267 *et al.* (Jan. 31, 2001) (“*A.L. Cattle*”).

REASONS SUPPORTING MOTION

The Surface Water Coalition's Motion to File Late Objections is supported by good cause and a meritorious position, hence it meets the above standard. The Coalition only recently became aware of the issues presented by the subject claims and subcases in conjunction with its July 25, 2007 filing of timely objections to similar claims in subcase nos. 22-589B, 22-605, 22-12654, 22-12695 and 22-13342. The subject claims in Basin 21, like the claims in Basin 22 to which the Coalition has objected, seek to establish water rights for purposes of “ground water recharge”, with priority dates ranging from 1885 to 1897. The claimed points of diversion and place of use are also in the same vicinity in the Henry’s Fork area as some of the Basin 22 claims. The IDWR Director’s recommendations for these claims identify the “BASIS OF CLAIM – Decreed”. Neither the claims themselves nor the IDWR Director's recommendations cite any legal or factual authority supporting this claimed water right for “ground water recharge”, either generally or as of the early priority dates sought. Moreover, the Coalition is unaware of any court proceeding that has decreed “ground water recharge” claims in Idaho. The establishment of such claims to divert these water sources tributary to the Snake River during the

winter months may conflict with reservoir storage water rights and operations critical to the Coalition.

While the Coalition does not oppose ground water recharge generally, parties seeking water rights related to ground water recharge must comply with applicable statutes and legal authority. *See, e.g.*, I.C. §§ 42-234, 42-4201 to 4204. To the best of the Coalition's knowledge the bases for the claims are decreed irrigation rights held by the claimants, not decreed water rights for "ground water recharge" purposes during the irrigation storage season.

Alternatively, the Coalition's Motion to Participate meets the standards of AO1 and I.R.C.P. 24 for motions to intervene. *See* AO#1, Sec. 10.k ("[a] *Motion to Participate* shall be treated like a motion to intervene under I.R.C.P. 24"). With respect to intervention as a right under I.R.C.P. 24(a), the Coalition claims an interest relating to the property or transaction which is the subject of the action, namely, that the water in the Snake River which is the subject of claimant's water right is subject to prior water rights on the river for other beneficial uses, including but not limited to storage water rights at American Falls Reservoir. Moreover, disposition of the claim through a decree in the SRBA will as a practical matter impair the Coalition's ability to protect that interest, as all parties to the SRBA ultimately will be bound by the Court's decree. Furthermore, the Coalition's interest is not adequately represented by existing parties, since the only party filing objections, the Bureau of Land Management in the U.S. Department of the Interior, has objected on a different basis concerning land ownership, and has indicated its willingness to settle upon resolution of its objections on that limited basis (see recently filed Standard Form 5s in the case).

With respect to permissive intervention under I.R.C.P. 24(b), the Coalition's objection, the claim, and IDWR's recommendation have questions of law and fact in common, namely, whether the claimant can establish as a matter of law and fact that it is entitled to a water right for ground water recharge with priority dates more than century old. Allowing the Coalition's late objections or participation in this matter will not unduly delay or prejudice the adjudication of these rights. There has been no trial or substantive proceedings in these subcases, which have been the subject of settlement activities but which have not yet proceeded to partial decree. *See Duff v. Draper*, 96 Idaho 299, 527 P.2d 1257 (1974); *Herzog v. City of Pocatello*, 82 Idaho 505, 356 P.2d 54 (1960) (motion for intervention timely when filed before trial).

The Coalition is submitting for filing together with this motion its proposed objections (see Exhibit B), which comprise its claims and defenses in these matters for purposes of procedure under I.R.C.P. 24(c).

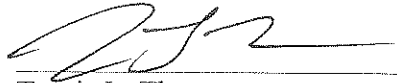
REQUEST FOR HEARING

Counsel (Travis Thompson) for A&B, BID, Milner, NSCC, and TFCC spoke with Counsel (Jerry Rigby) for some of the claimants (Egin Bench and Southeast Idaho Canal) on August 29, 2007 about a hearing date on this motion and mentioned that it would be better to discuss at the upcoming status conference on September 5, 2007 rather than try and have the motion heard that day. Counsel for the Coalition plans to attend the status conference and discuss the scheduling of a hearing date with the Court and the parties.

DATED this 30th day of August, 2007.


Roger D. Ling

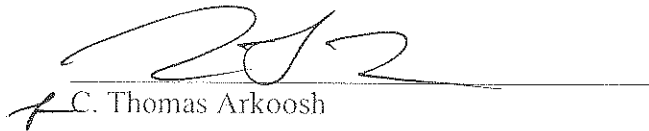
BARKER ROSHOLT & SIMPSON LLP



Travis L. Thompson

Attorneys for A&B Irrigation District, Burley
Irrigation District, Milner Irrigation District, North
Side Canal Company and Twin Falls Canal
Company

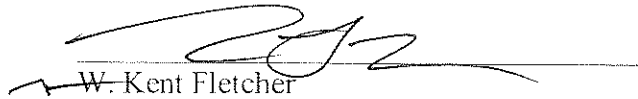
ARKOOSH LAW OFFICES, CHTD.



C. Thomas Arkoosh

Attorneys for American Falls Reservoir District #2

FLETCHER LAW OFFICE



W. Kent Fletcher

Attorneys for Minidoka Irrigation District

CERTIFICATE OF MAILING

I certify that on August 30th, 2007, I mailed the original and copies of the foregoing motion, including all exhibits, to the following persons:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, Idaho 83303-2707

Egin Bench Canals, Inc.
P.O. Box 15
St. Anthony, Idaho 83445

Southeast Idaho Canal Co.
P.O. Box 15
St. Anthony, Idaho 83445

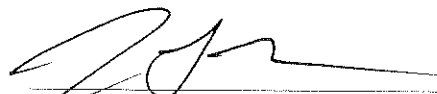
IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

Salem Union Canal Co. Ltd.
c/o Jerry Dalling
1419 N 7th N.
Sugar City, Idaho 83448

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724

Jerry Rigby
Rigby Thatcher, Chtd.
P.O. Box 250
Rexburg, Idaho 83440-0250



Travis L. Thompson

EXHIBIT A

21-12897
21-12907
21-12920
21-12922
21-12924
21-12928
21-12953
21-12962

Exhibit B

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12897
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name:	Twin Falls Canal Company	A&B Irrigation District
Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675
	North Side Canal Company	Burley Irrigation District
	921 N. Lincoln Ave.	246 E 100 S
	Jerome, Idaho 83338	Burley, Idaho 83318
	Milner Irrigation District	
	5294 E 3610 N	
	Murtaugh, Idaho 83344	

Name and Address of Attorney:

Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
	113 Main Ave W., Suite 303
	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Egin Bench Canals, Inc.
Address:	P.O. Box 15
	St. Anthony, Idaho 83445

OBJECTION

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____
3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**

☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

OBJECTION

F.

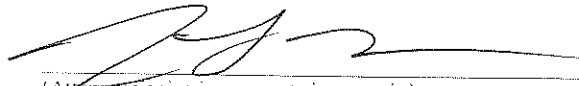
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

TRAVIS L. THOMPSON, duly sworn, upon oath, deposes and says:

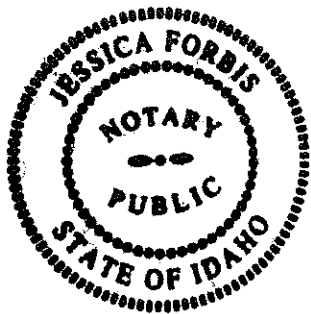
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)



(Attorney signing in representative capacity)

Subscribed and sworn to before me on: August 30, 2007





Notary Public for Idaho
Residing at: Twin Falls
My Commission Expires: 4/3/12

OBJECTION

CERTIFICATE OF MAILING

I certify that on August 30th, 2007, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

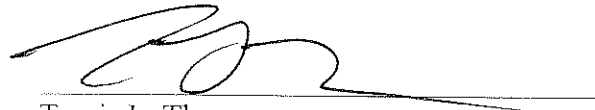
Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12920
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name:	Twin Falls Canal Company	A&B Irrigation District
Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675
	North Side Canal Company	Burley Irrigation District
	921 N. Lincoln Ave.	246 E 100 S
	Jerome, Idaho 83338	Burley, Idaho 83318
	Milner Irrigation District	
	5294 E 3610 N	
	Murtaugh, Idaho 83344	

Name and Address of Attorney:

Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
	113 Main Ave W., Suite 303
	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Southeast Idaho Canal Co.
Address:	P.O. Box 15
	St. Anthony, Idaho 83445

OBJECTION

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

1. ☐ **Name and Address**
Should be: ____

2. ☐ **Source**
Should be: ____

3. ☒ **Quantity**
Should be: ____

4. ☒ **Priority Date**
Should be: ____

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Should be: ____

6. ☐ **Instream Flow Description**
Should be: ____

7. ☒ **Purpose(s) of Use**
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8. ☒ **Period of Year**
Should be: ____

9. ☐ **Place of Use**
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Should be: ____

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E. **REASONS SUPPORTING OBJECTION(S):**

OBJECTION

F.

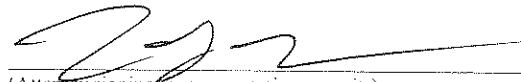
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State of Idaho)
) ss.
County of Twin Falls)

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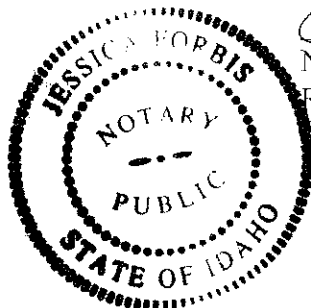
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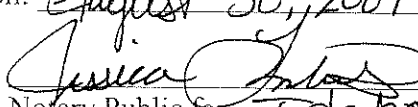


(Attorney signing in representative capacity)

Subscribed and sworn to before me on:

August 30, 2007





Notary Public for

Idaho

Residing at:

Twin Falls

My Commission Expires:

4/3/12

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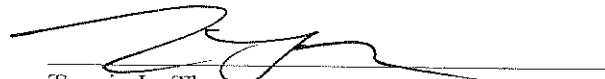
Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
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P.O. Box 44449
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United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
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Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12924
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name:	Twin Falls Canal Company	A&B Irrigation District
Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675
	North Side Canal Company	Burley Irrigation District
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Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
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	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Salem Union Canal Co., Ltd.
Address:	c/o Jerry Dalling
	Sugar City, Idaho 83448

OBJECTION

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____

2. ☐ **Source**
Should be: ____

3. ☒ **Quantity**
Should be: ____

4. ☒ **Priority Date**
Should be: ____

5. ☐ **Point(s) of diversion**
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6. ☐ **Instream Flow Description**
Should be: ____

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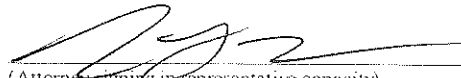
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) ss.
County of Twin Falls)

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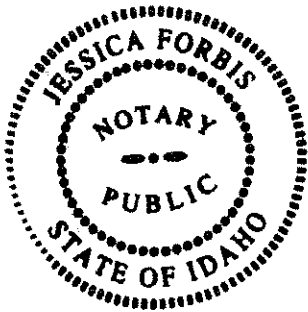
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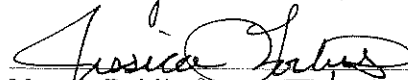


(Attorney signing in representative capacity)

Subscribed and sworn to before me on: _____

August 30, 2007





Notary Public for _____

Residing at: Twin Falls

My Commission Expires: 4/3/12

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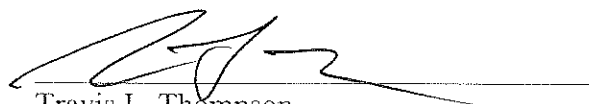
Name: Salem Union Canal Co., Ltd.
Address: c/o Jerry Dalling
Sugar City, Idaho 83448

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12953
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

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Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675
	North Side Canal Company	Burley Irrigation District
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	Milner Irrigation District	
	5294 E 3610 N	
	Murtaugh, Idaho 83344	

Name and Address of Attorney:

Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
	113 Main Ave W., Suite 303
	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Southeast Idaho Canal Co.
Address:	P.O. Box 15
	St. Anthony, Idaho 83445

OBJECTION

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10. ☐ **Remarks**
Should be: ____
11. **I object because:**

- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. **REASONS SUPPORTING OBJECTION(S):**

OBJECTION

F.

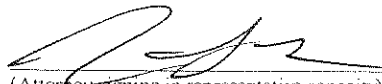
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

TRAVIS L. THOMPSON, duly sworn, upon oath, deposes and says:

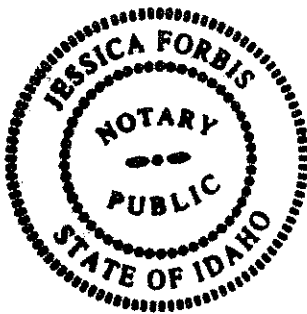
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)



(Attorney signing in representative capacity)

Subscribed and sworn to before me on: _____



Notary Public for _____

Residing at: _____

My Commission Expires: _____

OBJECTION

CERTIFICATE OF MAILING

I certify that on August 30th, 2007, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

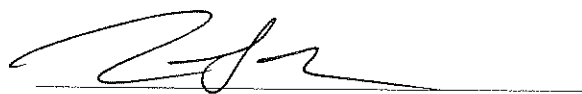
Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12907
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name:	Twin Falls Canal Company	A&B Irrigation District
Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675
	North Side Canal Company	Burley Irrigation District
	921 N. Lincoln Ave.	246 E 100 S
	Jerome, Idaho 83338	Burley, Idaho 83318
	Milner Irrigation District	
	5294 E 3610 N	
	Murtaugh, Idaho 83344	

Name and Address of Attorney:

Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
	113 Main Ave W., Suite 303
	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Southeast Idaho Canal Co.
Address:	P.O. Box 15
	St. Anthony, Idaho 83445

OBJECTION

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____
3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**

☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. **REASONS SUPPORTING OBJECTION(S):**

OBJECTION

F.

VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

TRAVIS L. THOMPSON, duly sworn, upon oath, deposes and says:

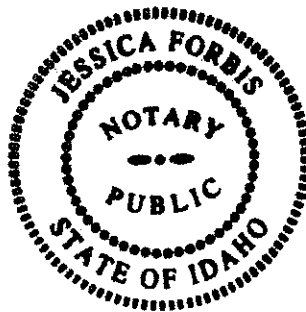
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)

(Attorney signing in representative capacity)

Subscribed and sworn to before me on: _____

August 30, 2007



Notary Public for _____

Residing at: _____

My Commission Expires: _____

Idaho
Twin Falls
4/30/12

OBJECTION

CERTIFICATE OF MAILING

I certify that on August 30th, 2007, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12922
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name:	Twin Falls Canal Company	A&B Irrigation District
Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675

North Side Canal Company	Burley Irrigation District
921 N. Lincoln Ave.	246 E 100 S
Jerome, Idaho 83338	Burley, Idaho 83318

Milner Irrigation District
5294 E 3610 N
Murtaugh, Idaho 83344

Name and Address of Attorney:

Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
	113 Main Ave W., Suite 303
	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Egin Bench Canals, Inc.
Address:	P.O. Box 15
	St. Anthony, Idaho 83445

OBJECTION

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____
3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**
 - ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
 - ☐ This water right was not recommended, but should be recommended with the elements described above.

E. **REASONS SUPPORTING OBJECTION(S):**

OBJECTION

F.

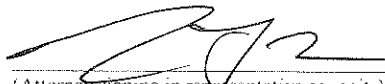
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

TRAVIS L. THOMPSON, duly sworn, upon oath, deposes and says:

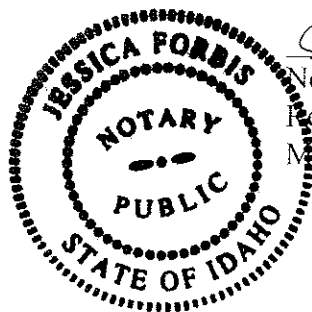
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

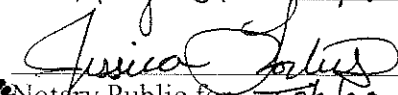
(Signature of person filing objection)



(Attorney signing in representative capacity)

Subscribed and sworn to before me on: August 30, 2007





Notary Public for Idaho
Residing at: Twin Falls
My Commission Expires: 4/3/12

CERTIFICATE OF MAILING

I certify that on August 30th, 2007, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

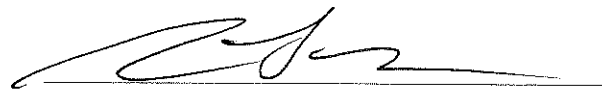
Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12928
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name:	Twin Falls Canal Company	A&B Irrigation District
Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675
	North Side Canal Company	Burley Irrigation District
	921 N. Lincoln Ave.	246 E 100 S
	Jerome, Idaho 83338	Burley, Idaho 83318
	Milner Irrigation District	
	5294 E 3610 N	
	Murtaugh, Idaho 83344	

Name and Address of Attorney:

Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
	113 Main Ave W., Suite 303
	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Egin Bench Canals, Inc.
Address:	P.O. Box 15
	St. Anthony, Idaho 83445

OBJECTION

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____
3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**

- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. **REASONS SUPPORTING OBJECTION(S):**

OBJECTION

F.

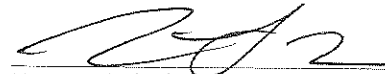
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

TRAVIS L. THOMPSON, duly sworn, upon oath, deposes and says:

That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

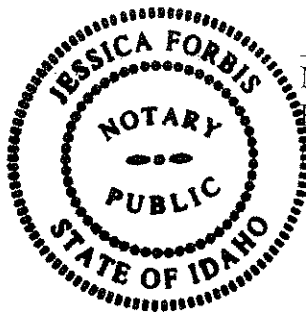
(Signature of person filing objection)



(Attorney signing in representative capacity)

Subscribed and sworn to before me on:

August 30, 2007



Notary Public for

Residing at:

My Commission Expires:

Jessica Forbis

Idaho

Twin Falls

4/3/12

CERTIFICATE OF MAILING

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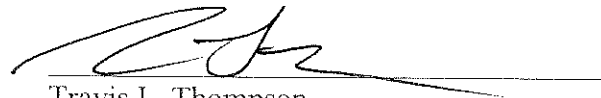
Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12962
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name:	Twin Falls Canal Company	A&B Irrigation District
Address:	P.O. Box 326	P.O. Box 675
	Twin Falls, Idaho 83303-0326	Rupert, Idaho 83350-0675
	North Side Canal Company	Burley Irrigation District
	921 N. Lincoln Ave.	246 E 100 S
	Jerome, Idaho 83338	Burley, Idaho 83318
	Milner Irrigation District	
	5294 E 3610 N	
	Murtaugh, Idaho 83344	

Name and Address of Attorney:

Attorney Name:	John K. Simpson / Travis L. Thompson / Paul L. Arrington
Attorney Address	Barker Rosholt & Simpson LLP
	113 Main Ave W., Suite 303
	P.O. Box 485
	Twin Falls, Idaho 83303-0485
Attorney Phone:	(208) 733-0700

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name:	Egin Bench Canals, Inc.
Address:	P.O. Box 15
	St. Anthony, Idaho 83445

OBJECTION

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____
3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**
 - ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
 - ☐ This water right was not recommended, but should be recommended with the elements described above.

E. **REASONS SUPPORTING OBJECTION(S):**

OBJECTION

F.

VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

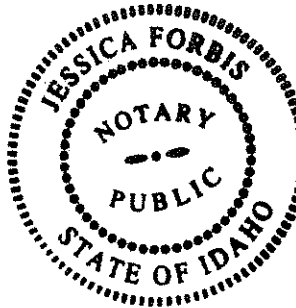
TRAVIS L. THOMPSON, duly sworn, upon oath, deposes and says:

That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)

(Attorney signing in representative capacity)

Subscribed and sworn to before me on: August 30, 2007



Jessica Forbis
Notary Public for Idaho
Residing at: Twin Falls
My Commission Expires: 4/3/12

CERTIFICATE OF MAILING

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1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

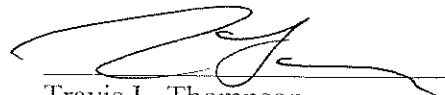
Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12897
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Name and Address of Attorney:

Attorney Name: C. Tom Arkoosh
Attorney Address: Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

- ☐ **Name and Address**
Should be: ____
- ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
 Should be: ____

4. ☒ **Priority Date**
 Should be: ____

5. ☐ **Point(s) of diversion**
 Should be: ____

6. ☐ **Instream Flow Description**
 Should be: ____

7. ☒ **Purpose(s) of Use**
 Should be: ____

8. ☒ **Period of Year**
 Should be: ____

9. ☐ **Place of Use**
 Should be: ____

10. ☐ **Remarks**
 Should be: ____

11. **I object because:**

- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F. VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Gooding)

C. TOM ARKOOSH, duly sworn, upon oath, deposes and says:

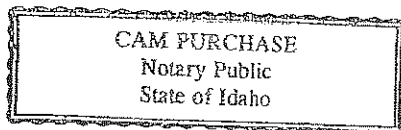
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this

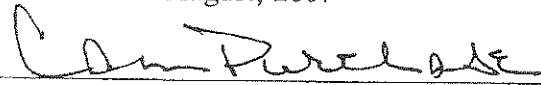
OBJECTION

objection, know its contents and believe that the statements are true to the best of my knowledge.


C. Tom Arkoosh

Subscribed and sworn to before me on the 30th of August, 2007




Notary Public for IDAHO

Residing at: BLISS

My Commission Expires: 7/16/10

OBJECTION

CERTIFICATE OF MAILING

I certify that on August 30th, 2007, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

In Re SRBA) A. Subcase No. 21-12907
)
Case No. 39576) **STANDARD FORM 1**
) **OBJECTION**
)

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Attorney Name: C. Tom Arkoosh
Attorney Address: Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

1. ☐ **Name and Address**
Should be: _____
2. ☐ **Source**
Should be: _____

1

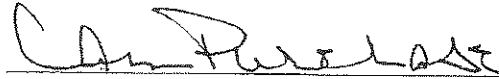
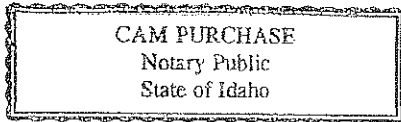
- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
- ☐ This water right was not recommended, but should be recommended with the elements described above.

objection, know its contents and believe that the statements are true to the best of my knowledge.



C. Tom Arkoosh

Subscribed and sworn to before me on the 30th of August, 2007



Notary Public for IDAHO

Residing at: BLISS

My Commission Expires: 7/16/10

OBJECTION

CERTIFICATE OF MAILING

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Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

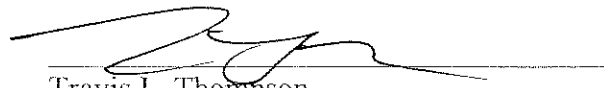
Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449


Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12920
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Name and Address of Attorney:

Attorney Name: C. Tom Arkoosh
Attorney Address: Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____

11. **I object because:**

- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F. VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Gooding)

C. TOM ARKOOSH, duly sworn, upon oath, deposes and says:

That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this

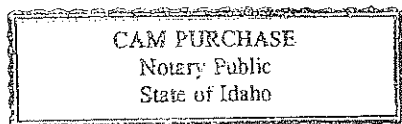
OBJECTION

objection, know its contents and believe that the statements are true to the best of my knowledge.

CT

C. Tom Arkoosh

Subscribed and sworn to before me on the 30th of August, 2007



Cam Purchase

Notary Public for IDAHO
Residing at: BLISS
My Commission Expires: 7/16/10

CERTIFICATE OF MAILING

I certify that on August 20th, 2007, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

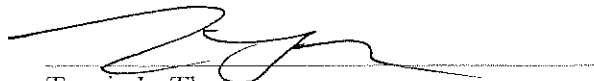
Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12922
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Name and Address of Attorney:

Attorney Name: C. Tom Arkoosh
Attorney Address: Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

- ☐ **Name and Address**
Should be: ____
- ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
Should be: ____

4. ☒ **Priority Date**
Should be: ____

5. ☐ **Point(s) of diversion**
Should be: ____

6. ☐ **Instream Flow Description**
Should be: ____

7. ☒ **Purpose(s) of Use**
Should be: ____

8. ☒ **Period of Year**
Should be: ____

9. ☐ **Place of Use**
Should be: ____

10. ☐ **Remarks**
Should be: ____

11. **I object because:**

☒ This water right should not exist. (Groundwater Recharge Portion of Claim)

☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F. VERIFICATION (Must be Completed)

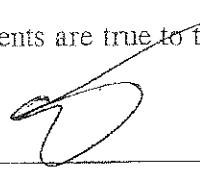
State of Idaho)
) ss.
County of Gooding)

C. TOM ARKOOSH, duly sworn, upon oath, deposes and says:

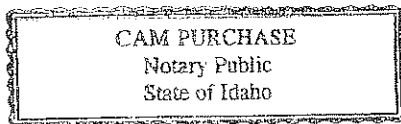
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this

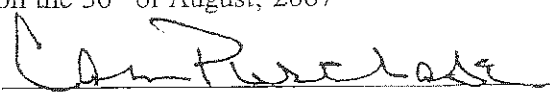
OBJECTION

objection, know its contents and believe that the statements are true to the best of my knowledge.


C. Tom Arkoosh

Subscribed and sworn to before me on the 30th of August, 2007




Notary Public for IDAHO
Residing at: BLISS
My Commission Expires: 7/16/18

CERTIFICATE OF MAILING

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Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

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P.O. Box 83720
Boise, Idaho 83720-0098

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State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724



Travis L. Thompson

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA	)	A. Subcase No. 21-12924
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Name and Address of Attorney:

Attorney Name: C. Tom Arkoosh
Attorney Address: Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Salem Union Canal Co., Ltd.
Address: c/o Jerry Dalling
Sugar City, Idaho 83448

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: _____
2. ☐ **Source**
Should be: _____

OBJECTION

3. ☒ Quantity
Should be: ____

4. ☒ Priority Date
Should be: ____

5. ☐ Point(s) of diversion
Should be: ____

6. ☐ Instream Flow Description
Should be: ____

7. ☒ Purpose(s) of Use
Should be: ____

8. ☒ Period of Year
Should be: ____

9. ☐ Place of Use
Should be: ____

10. ☐ Remarks
Should be: ____

11. I object because:

- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F. VERIFICATION (Must be Completed)

State of Idaho)
County of Gooding) ss.

C. TOM ARKOOSH, duly sworn, upon oath, deposes and says:

That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this

OBJECTION

CERTIFICATE OF MAILING

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Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

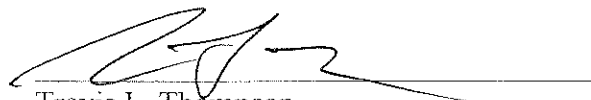
Name: Salem Union Canal Co., Ltd.
Address: c/o Jerry Dalling
Sugar City, Idaho 83448

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12928
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Name and Address of Attorney:

Attorney Name: C. Tom Arkoosh
Attorney Address: Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ Quantity
Should be: ____
4. ☒ Priority Date
Should be: ____
5. ☐ Point(s) of diversion
Should be: ____
6. ☐ Instream Flow Description
Should be: ____
7. ☒ Purpose(s) of Use
Should be: ____
8. ☒ Period of Year
Should be: ____
9. ☐ Place of Use
Should be: ____
10. ☐ Remarks
Should be: ____
11. **I object because:**
- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

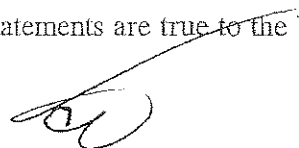
F. VERIFICATION (Must be Completed)

State of Idaho)
County of Gooding) ss.

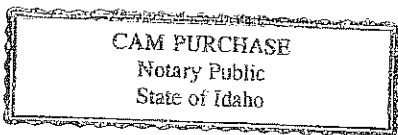
C. TOM ARKOOSH, duly sworn, upon oath, deposes and says:

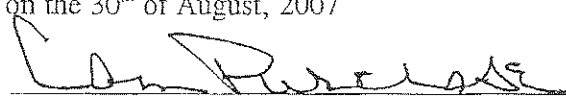
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this

objection, know its contents and believe that the statements are true to the best of my knowledge.


C. Tom Arkoosh

Subscribed and sworn to before me on the 30th of August, 2007




Notary Public for IDAHO

Residing at: BLISS

My Commission Expires: 7/16/10

OBJECTION

CERTIFICATE OF MAILING

I certify that on August 30th, 2007, I mailed the original and copies of this response, including all attachments, to the following persons:

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Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

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Boise, Idaho 83720-0098

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Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA)
)
Case No. 39576)
)

)

A. Subcase No. 21-12953

STANDARD FORM 1
OBJECTION

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Name and Address of Attorney:

Attorney Name: C. Tom Arkoosh
Attorney Address Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ Quantity
Should be: ____

4. ☒ Priority Date
Should be: ____

5. ☐ Point(s) of diversion
Should be: ____

6. ☐ Instream Flow Description
Should be: ____

7. ☒ Purpose(s) of Use
Should be: ____

8. ☒ Period of Year
Should be: ____

9. ☐ Place of Use
Should be: ____

10. ☐ Remarks
Should be: ____

11. I object because:

- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F. VERIFICATION (Must be Completed)

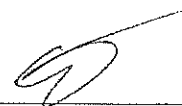
State of Idaho)
County of Gooding) ss.

C. TOM ARKOOSH, duly sworn, upon oath, deposes and says:

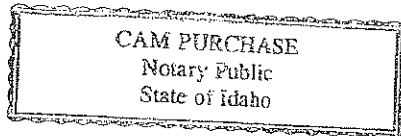
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this

OBJECTION

objection, know its contents and believe that the statements are true to the best of my knowledge.


C. Tom Arkoosh

Subscribed and sworn to before me on the 30th of August, 2007




Notary Public for IDAHO
Residing at: BLISS
My Commission Expires: 7/16/10

OBJECTION

CERTIFICATE OF MAILING

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Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
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Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


Travis L. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12962
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: American Falls Reservoir District #2
Address: 112 S. Apple St.
Shoshone, ID 83352

Name and Address of Attorney:

Attorney Name: C. Tom Arkoosh
Attorney Address: Arkoosh Law Offices, CHTD
301 Main St.
P.O. Box 32
Gooding, ID 83330
Attorney Phone: (208) 934-8872

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

- ☐ **Name and Address**
Should be: ____
- ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
Should be: ____

4. ☒ **Priority Date**
Should be: ____

5. ☐ **Point(s) of diversion**
Should be: ____

6. ☐ **Instream Flow Description**
Should be: ____

7. ☒ **Purpose(s) of Use**
Should be: ____

8. ☒ **Period of Year**
Should be: ____

9. ☐ **Place of Use**
Should be: ____

10. ☐ **Remarks**
Should be: ____

11. **I object because:**

- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F. VERIFICATION (Must be Completed)

State of Idaho)
County of Gooding) ss.

C. TOM ARKOOSH, duly sworn, upon oath, deposes and says:

That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this

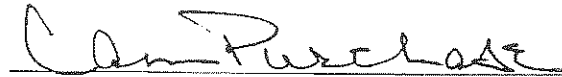
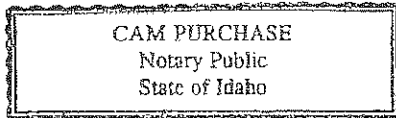
OBJECTION

objection, know its contents and believe that the statements are true to the best of my knowledge.



C. Tom Arkoosh

Subscribed and sworn to before me on the 30th of August, 2007



Notary Public for IDAHO

Residing at: BLISS

My Commission Expires: 7/16/10

OBJECTION

CERTIFICATE OF MAILING

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Boise, Idaho 83724


Travis L. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12924
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
P.O. Box 248
Burley, ID 83318

Attorney Phone: (208) 678-3250

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Salem Union Canal Co., Ltd.
Address: c/o Jerry Dalling
Sugar City, Idaho 83448

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: _____
2. ☐ **Source**
Should be: _____

OBJECTION

3. ☒ **Quantity**
 Should be: ____
4. ☒ **Priority Date**
 Should be: ____
5. ☐ **Point(s) of diversion**
 Should be: ____
6. ☐ **Instream Flow Description**
 Should be: ____
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 Should be: ____
8. ☒ **Period of Year**
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10. ☐ **Remarks**
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11. **I object because:**
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- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F.

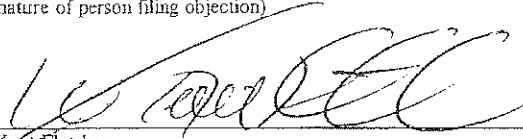
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

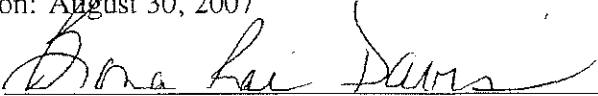
W. Kent Fletcher, duly sworn, upon oath, deposes and says:

That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)


W. Kent Fletcher

Subscribed and sworn to before me on: August 30, 2007


Notary Public for Idaho
Residing at: Burley
My Commission Expires: 7-05-2008

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Address: c/o Jerry Dalling
Sugar City, Idaho 83448

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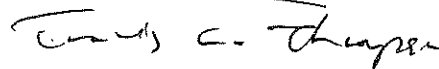
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United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449



W. Kent Fletcher



IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12928
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
P.O. Box 248
Burley, ID 83318

Attorney Phone: (208) 678-3250

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**
- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F.

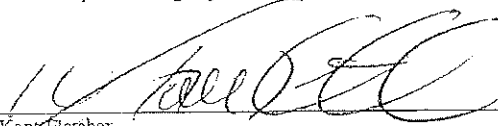
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

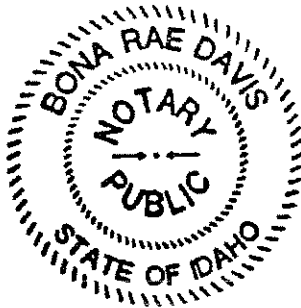
W. Kent Fletcher, duly sworn, upon oath, deposes and says:

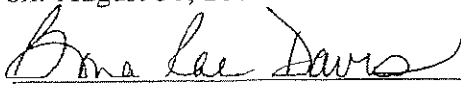
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)


W. Kent Fletcher

Subscribed and sworn to before me on: August 30, 2007




Notary Public for Idaho
Residing at: Burley
My Commission Expires: 7-05-2008

OBJECTION

CERTIFICATE OF MAILING

I certify that on April 30th, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

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Environment & Natural Resources Division
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Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449


W. Kent Fletcher


IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12922
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
P.O. Box 248
Burley, ID 83318

Attorney Phone: (208) 678-3250

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
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9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**
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- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F.

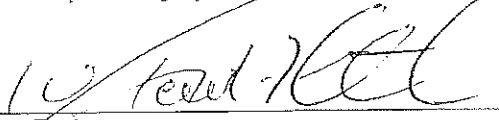
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

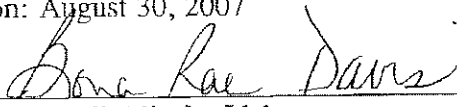
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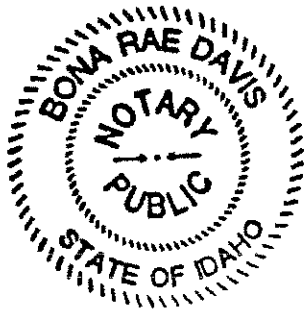
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(Signature of person filing objection)


W. Kent Fletcher

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Notary Public for Idaho
Residing at: Burley
My Commission Expires: 7-05-2008



OBJECTION

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Address: P.O. Box 15
St. Anthony, Idaho 83445

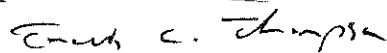
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Boise, Idaho 83724

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449



W. Kent Fletcher


IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12897
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
P.O. Box 248
Burley, ID 83318

Attorney Phone: (208) 678-3250

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
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10. ☐ **Remarks**
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11. **I object because:**
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- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F.

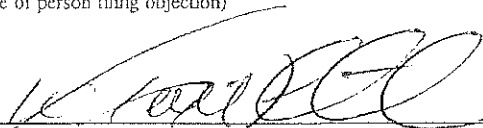
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

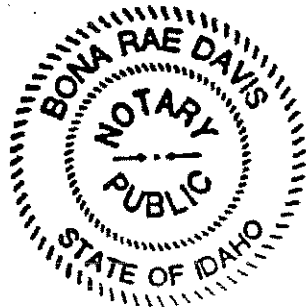
W. Kent Fletcher, duly sworn, upon oath, deposes and says:

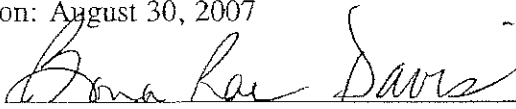
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(Signature of person filing objection)


W. Kent Fletcher

Subscribed and sworn to before me on: August 30, 2007




Notary Public for Idaho
Residing at: Burley
My Commission Expires: 7-05-2008

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Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

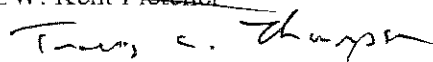
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United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724



W. Kent Fletcher


IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12962
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
P.O. Box 248
Burley, ID 83318

Attorney Phone: (208) 678-3250

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
 Should be: ____
4. ☒ **Priority Date**
 Should be: ____
5. ☐ **Point(s) of diversion**
 Should be: ____
6. ☐ **Instream Flow Description**
 Should be: ____
7. ☒ **Purpose(s) of Use**
 Should be: ____
8. ☒ **Period of Year**
 Should be: ____
9. ☐ **Place of Use**
 Should be: ____
10. ☐ **Remarks**
 Should be: ____
11. **I object because:**
- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F.

VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

W. Kent Fletcher, duly sworn, upon oath, deposes and says:

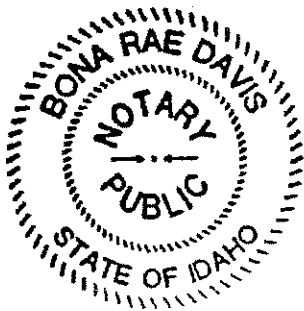
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)



W. Kent Fletcher

Subscribed and sworn to before me on: August 30, 2007


Notary Public for Idaho
Residing at: Burley
My Commission Expires: 7-05-2008

OBJECTION

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Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

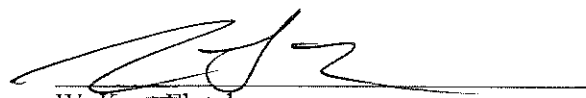
Name: Egin Bench Canals, Inc.
Address: P.O. Box 15
St. Anthony, Idaho 83445

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Boise, Idaho 83720-0098

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Office of the Attorney General
State of Idaho
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United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


W. Kent Fletcher
Trans. C. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12953
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
P.O. Box 248
Burley, ID 83318

Attorney Phone: (208) 678-3250

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es).:

1. ☐ **Name and Address**
Should be: ____
2. ☐ **Source**
Should be: ____

OBJECTION

3. ☒ **Quantity**
Should be: ____
4. ☒ **Priority Date**
Should be: ____
5. ☐ **Point(s) of diversion**
Should be: ____
6. ☐ **Instream Flow Description**
Should be: ____
7. ☒ **Purpose(s) of Use**
Should be: ____
8. ☒ **Period of Year**
Should be: ____
9. ☐ **Place of Use**
Should be: ____
10. ☐ **Remarks**
Should be: ____
11. **I object because:**
- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F.

VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

W. Kent Fletcher, duly sworn, upon oath, deposes and says:

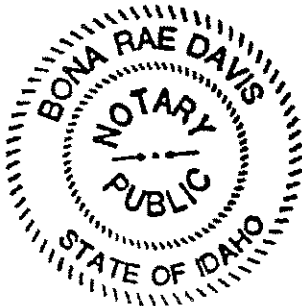
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

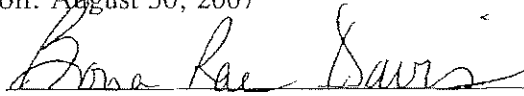
(Signature of person filing objection)



W. Kent Fletcher

Subscribed and sworn to before me on: August 30, 2007





Notary Public for Idaho
Residing at: Burley
My Commission Expires: 7-05-2008

CERTIFICATE OF MAILING

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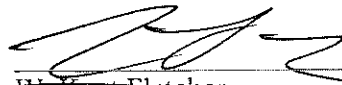
Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

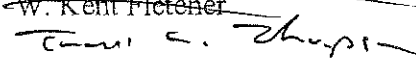
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United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


W. Kent Fletcher


Carol A. Chapman

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12920
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
P.O. Box 248
Burley, ID 83318

Attorney Phone: (208) 678-3250

C. CLAIMANT OF WATER RIGHT AS LISTED IN DIRECTOR'S REPORT:

Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

D. I object to the following elements as recommended in the Director's Report. (Please check the appropriate box(es)).:

1. ☐ **Name and Address**
Should be: ____
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OBJECTION

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E. REASONS SUPPORTING OBJECTION(S):

F.

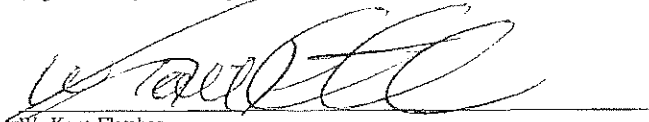
VERIFICATION (Must be Completed)

State of Idaho)
County of Twin Falls) ss.

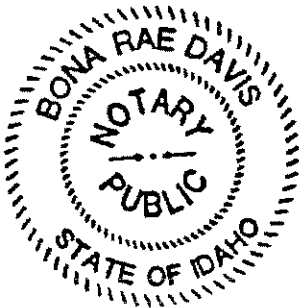
W. Kent Fletcher, duly sworn, upon oath, deposes and says:

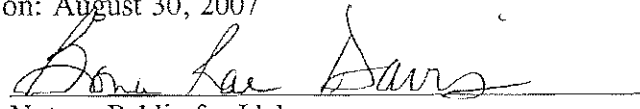
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(Signature of person filing objection)


W. Kent Fletcher

Subscribed and sworn to before me on: August 30, 2007




Notary Public for Idaho
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OBJECTION

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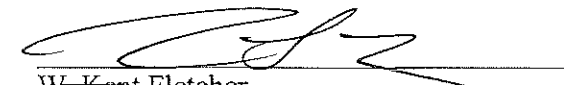
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Address: P.O. Box 15
St. Anthony, Idaho 83445

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United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


W. Kent Fletcher


Travis C. Thompson

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA	)	A. Subcase No. 21-12907
	)	
Case No. 39576	)	STANDARD FORM 1
	)	OBJECTION
_____	)	

B. NAME AND ADDRESS OF PERSON(S) OBJECTING:

Name: Minidoka Irrigation District
Address: 98 West 50 South
Rupert, ID 83350

Name and Address of Attorney:

Attorney Name: W. Kent Fletcher
Attorney Address: Fletcher Law Office
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Attorney Phone: (208) 678-3250

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Address: P.O. Box 15
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Should be: ____
11. **I object because:**
- ☒ This water right should not exist. (Groundwater Recharge Portion of Claim)
- ☐ This water right was not recommended, but should be recommended with the elements described above.

E. REASONS SUPPORTING OBJECTION(S):

F.

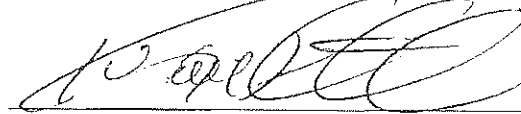
VERIFICATION (Must be Completed)

State of Idaho)
) ss.
County of Twin Falls)

W. Kent Fletcher, duly sworn, upon oath, deposes and says:

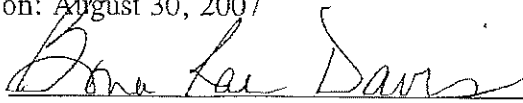
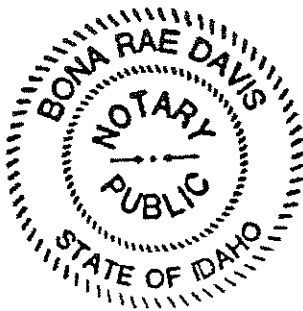
That I am the party/claimant filing this objection, as defined by I.C. §§ 42-1401A(1) and (6) or that I am the attorney for the party/claimant objecting and that I have read this objection, know its contents and believe that the statements are true to the best of my knowledge.

(Signature of person filing objection)



W. Kent Fletcher

Subscribed and sworn to before me on: August 30, 2007



Notary Public for Idaho

Residing at: Burley

My Commission Expires: 7-05-2008

OBJECTION

CERTIFICATE OF MAILING

I certify that on Aug 30th, I mailed the original and copies of this response, including all attachments, to the following persons:

1. Original to:

Clerk of the District Court
Snake River Basin Adjudication
P.O. Box 2707
Twin Falls, ID 83303-2707

2. One copy to the claimant and parties who filed the objections at the following address:

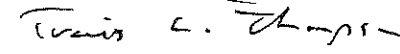
Name: Southeast Idaho Canal Co.
Address: P.O. Box 15
St. Anthony, Idaho 83445

3. Copies to:

IDWR Document Depository
P.O. Box 83720
Boise, Idaho 83720-0098

Chief, Natural Resources Division
Office of the Attorney General
State of Idaho
P.O. Box 44449
Boise, Idaho 83711-4449

United States Department of Justice
Environment & Natural Resources Division
550 West Fort Street, MSC 033
Boise, Idaho 83724


W. Kent Fletcher

Travis L. Thompson