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*Attorneys for American Falls Reservoir
District #2 and Minidoka Irrigation District*

RECEIVED
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DEPT OF WATER RESOURCES
SOUTHERN REGION

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MAR 03 2022

Department of Water Resources
Eastern Region

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION)
FOR TRANSFER NO. T85750)
(in the name of J&L Holdings LLC))
)
)
)

NOTICE OF JOINT PROTEST

A&B IRRIGATION DISTRICT, BURLEY IRRIGATION DISTRICT, MILNER
IRRIGATION DISTRICT, NORTH SIDE CANAL COMPANY, TWIN FALLS CANAL
COMPANY, AMERICAN FALLS RESERVOIR DISTRICT #2, AND MINIDOKA
IRRIGATION DISTRICT (hereinafter "Protestants"), by and through their attorneys of record,
BARKER ROSHOLT & SIMPSON LLP, and FLETCHER LAW OFFICE, hereby file this
Notice of Joint Protest to the approval of the above-numbered *Application for Transfer of Water
Right* filed by the J&L HOLDINGS LLC ("Applicant"). The initial bases for the protests are as
follows:

FEB 25 2022

DEPT OF WATER RESOURCES
SOUTHERN REGION

1. The Applicant has failed to demonstrate that the transfer will not injure existing water rights and has failed to provide any proposed mitigation to offset impacts resulting from the transfer.
2. The Protestants have protested a related application for permit case (25-14497) that may be implicated and resolved by this transfer. Further, the Protestants have protested a separate transfer (T88488) involving the underlying ground water right 35-7720 that may relate to this transfer and the requested "offset" regarding mitigation obligations in that matter.
3. The Applicant has failed to show that the Application meets the criteria required by Idaho Code § 42-222.
4. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 25th day of February, 2022.

FLETCHER LAW OFFICE
W. Kent Fletcher

*Attorneys for American Falls Reservoir
District #2 & Minidoka Irrigation District*

BARKER ROSHOLT & SIMPSON LLP
Travis L. Thompson
Sarah W. Higer

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

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2022, I served a true and correct copy of the foregoing NOTICE OF JOINT PROTEST;

By hand-delivery to the following:

Idaho Department of Water Resources
Southern Region
650 Addison Ave W, Ste 500
Twin Falls, ID 83301-5858

And by United States Mail and Email to:

J&L Holdings LLC
P.O. Box 111
Irwin, Idaho 83848

Rocky Mountain Water Exchange LLC
482 Constitution Way, Suite 303
Idaho Falls, Idaho 83402
kristin.rmea@gmail.com



Travis L. Thompson

Idaho Department of Water Resources Receipt

Receipt ID: S039100

Payment Amount	\$50.00	Date Received	2/25/2022	Region	SOUTHERN
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Payment Type	Check	Check Number	1726
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Payer BARKER ROSHOLT & SIMPSON LLP

Comments NOTICE OF PROTEST ON BEHALF OF A&B IRRIGATION DIST, BURLEY IRRIGATION DIST, MILNER, N.S. CANAL CO., TF CANAL CO., AMERICAN FALLS RESERVOIR DIST, #2, MINIDOKA IRRIGATION DIST. AGAINST J&L HOLDINGS, LLC. TRANSFER #T85750, WR#35-7720.

Fee Details

Amount	Description	PCA	Fund	Fund Detail	Subsidiary	Object
\$50.00	PROTESTS	64103	0229	21		1155



Signature Line (Department Representative)