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*Attorneys for American Falls Reservoir
District #2 and Minidoka Irrigation District*
Department of Water Resources
Eastern Region

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MAY 03 2021

DEPT OF WATER RESOURCES
SOUTHERN REGION

RECEIVED

MAY 10 2021

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

IN THE MATTER OF APPLICATION FOR
TRANSFER NO. T84843

In the name of Dan Olsen and/or Jennie Olsen

NOTICE OF PROTEST

A&B IRRIGATION DISTRICT, AMERICAN FALLS RESERVOIR DISTRICT #2,
BURLEY IRRIGATION DISTRICT, MILNER IRRIGATION DISTRICT, MINIDOKA
IRRIGATION DISTRICT, NORTH SIDE CANAL COMPANY and TWIN FALLS CANAL
COMPANY (the "Coalition" or "Protestants"), by and through their attorneys of record, file this
Notice of Protest to the approval of the above-numbered *Application for Transfer* filed by DAN
OLSEN AND/OR JENNIE OLSEN (the "Applicants").

The initial bases for protest are as follows:

1. The Applicants propose to move the point of diversion and source of this water right
from Palisades Creek to the Snake River. There is no explanation as to how this change will not
injure existing water rights to the Snake River.

2. The Applicants have 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.

3. The Applicants have 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 3rd day of May, 2021.

FLETCHER LAW OFFICE


W. Kent Fletcher

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Canal Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May, 2021, I served a copy of the foregoing NOTICE
OF PROTEST, by hand-delivery to the following:

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

And by Mail to:

DAN & JENNIE OLSEN
22 RED ROCK LN
LAGUNA NIGUEL CA 92677


Travis L. Thompson

FOR OFFICE USE ONLY:

Fees paid: \$50.00 Date: 5/3/2021
Receipt No.: S038565 By: 