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Department of Water Resources
Eastern Region

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DEPT OF WATER RESOURCES
SOUTHERN REGION

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

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

IN THE MATTER OF APPLICATION)
FOR TRANSFER NO. T84488)
(in the name of LCSC Enterprises 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 LCSC Enterprises LLC ("Applicant"). The initial bases for the protests are as
follows:

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 Applicant has failed to provide sufficient information on the historic use of water right 35-14041 necessary to evaluate the proposed transfer.

3. The Applicant has failed to show how the location and use of the new points of diversion (groundwater wells) will not impact the surface water supply and water rights in the Snake River.

4. The Applicant has failed to show that the Application meets the criteria required by Idaho Code § 42-222.

5. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 30th day of November, 2020.

FLETCHER LAW OFFICE



W. Kent Fletcher

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

BARKER ROSHOLT & SIMPSON LLP



Travis L. Thompson
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Irrigation District, Milner Irrigation District,
North Side Canal Company, and Twin Falls
Canal Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of November, 2020, I served a true and correct 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, ID 83301-5858

And by United States Mail and Email to:

LCSC Enterprises LLC
433 Las Colinas Blvd. E., Ste. 1290
Irving, Texas 75039-5058

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Travis L. Thompson

FOR OFFICE USE ONLY:

Fees paid: \$100.00 Date: 11/30/2020
Receipt No.: S038273 By: 