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JUN 01 2020

DEPT OF WATER RESOURCES
SOUTHERN REGION

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

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

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

IN THE MATTER OF APPLICATION)
FOR TRANSFER NO. 84009)
(in the name of Rocky Mountain Water)
Exchange, 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 filed by
ROCKY MOUNTAIN WATER EXCHANGE, LLC ("Applicant"). The initial bases for the
protests are as follows:

1. The Applicant has failed to adequately condition the water right to irrigation use only; and
2. The Applicant has failed to adequately justify the transfer of ground water as the transfer of a primary water right; and
3. The Applicant has failed to provide adequate evidence of the historic consumptive use thereby justifying the proposed transferred quantity; and
4. The application violates the criteria of I.C. § 42-222(1); and
5. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 1st day of June, 2020.

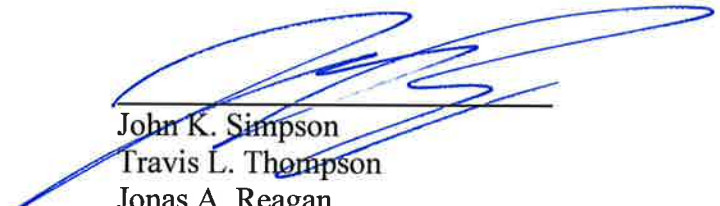
FLETCHER LAW OFFICE



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

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June, 2020, 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 to:

Rocky Mountain Water Exchange, LLC
482 Constitution Way
Ste 303
Idaho Falls, ID 83402


Jonas A. Reagan

FOR OFFICE USE ONLY:

Fee: \$50.00 total

Receipt #: S037952

Date: 6/1/2020

By: S. George