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RECEIVED

AUG 19 2019

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. 83471 )  
(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:

*Receipt  
#8037505*

1. The Applicant has failed to justify the transfer of ground water to a place of use already covered by surface water shares in contravention to I.C. §§ 31-3805, 67-6537; and
2. The application violates the criteria of I.C. § 42-222(1); and
3. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 19<sup>th</sup> day of August, 2019.

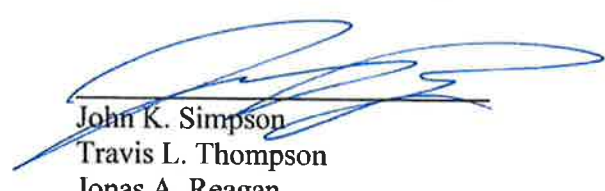
**FLETCHER LAW OFFICE**



W. Kent Fletcher

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

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Canal Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> day of August, 2019, 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:**

**Fees paid:** \$100.00      **Date:** 8/19/2019  
**Receipt No.:** S037505   **By:**