

Randall C. Budge (ISB# 1949)
Thomas J. Budge (ISB# 7465)
RACINE OLSON, PLLP
201 E. Center St. / P.O. Box 1391
Pocatello, Idaho 83204-1391
(208) 232-6101 – phone
(208) 232-6109 – fax
randy@racineolson.com
tj@racineolson.com

Attorneys for Idaho Ground Water Appropriators, Inc.

IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF APPLICATION
FOR TRANSFER NO. 83556

NOTICE OF PROTEST

In the name of W T WILLIAMS INC.

Idaho Ground Water Appropriators, Inc. (IGWA), by and through counsel, files this Notice of Protest to the above-referenced Application for Transfer under Idaho Code section 42-222.

The initial reasons for this protest are:

1. The proposed transfer will injure existing water rights, including but not limited to rights owned by IGWA members.
2. The proposed transfer will constitute an enlargement in use of the transferred water right and/or related water rights.
3. The proposed transfer is inconsistent with the local public interest as defined by Idaho Code § 42-202B.
4. The proposed transfer will adversely affect the local economy of the watershed and/or local area within which the source of water originates.
5. Forfeiture of the water rights being transferred.


IGWA reserves the right to oppose the Application for other reasons that may subsequently be discovered.

This protest may be resolved by demonstrating to IGWA's satisfaction that the proposed transfer will not constitute an enlargement in use of the transferred water right and/or related water rights.

DATED this 2nd day of October, 2019.

RACINE OLSON, PLLP

By:




Randall C. Budge

Thomas J. Budge

rept \$25.00 ID6045370 ct

CERTIFICATE OF SERVICE

I certify that on this the 2nd day of October, 2019, the foregoing document was served on the following persons in the manner indicated.



Signature of person mailing form

Idaho Department of Water Resources 900 North Skyline Drive, Suite A Idaho Falls, ID 83402-1718	<input checked="" type="checkbox"/> U.S. Mail/Postage Prepaid <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-mail
W T Williams Inc. 3094 N. 3200 E. Twin Falls, Idaho 83301	<input checked="" type="checkbox"/> U.S. Mail/Postage Prepaid <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-mail
Rocky Mountain Environmental Associates 482 Constitution Way, Ste 303 Idaho Falls, Idaho 83402 kristin.rmea@gmail.com	<input checked="" type="checkbox"/> U.S. Mail/Postage Prepaid <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-mail



RECEIVED
OCT 04 2019
Department of Water Resources
Eastern Region

October 2, 2019

Idaho Department of Water Resources
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718

Re: Transfer Nos. 83556

To whom it may concern,

Enclosed please find the original and one copy of a Notice of Protest against Transfer Application Nos. 83556 in the name of W T Williams Inc., together with a check in the amount of \$25.00 for the filing fee. Please file the original and conform stamp the extra copy and return it to me in the enclosed in the enclosed stamped and addressed return envelope.

Thank you for your assistance. Should you have any questions, please give me a call.

Sincerely,

A handwritten signature in dark ink, appearing to read 'T. J. Budge', is written over the typed name.

T. J. BUDGE