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

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OCT 15 2019

DEPT OF WATER RESOURCES
SOUTHERN REGION

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OCT 18 2019

Department of Water Resources
Eastern Region

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

IN THE MATTER OF APPLICATION)
FOR TRANSFER NO. T83556)
(in the name of W. T. Williams Inc.))
)
)
)

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
the W. T. Williams Inc. ("Applicant"). The initial bases for the protests are as follows:

1. The Applicant has failed to adequately address the mitigation requirements
through an inappropriate use of centroids within the ESPA model analysis;

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 15th day of October, 2019.


FLETCHER LAW OFFICE



W. Kent Fletcher

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

BARKER ROSHOLT & SIMPSON LLP



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Canal Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of October, 2019, 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 to:

W. T. Williams Inc.
3094 N 3200 E
Twin Falls, Idaho 83301

Rocky Mountain Environmental Associates
482 Constitution Way Ste 303
Idaho Falls, Idaho 83402


Jonas A. Reagan

FOR OFFICE USE ONLY: 

Fees paid: \$100.00 Date: 10/15/2019
Receipt No.: S037588 By: S.G. & D.M.