

John K. Simpson, ISB #4242
Travis L. Thompson, ISB #6168
Jonas. A. Reagan, ISB #10566
BARKER ROSHOLT & SIMPSON LLP
163 Second Avenue West
P.O. Box 63
Twin Falls, Idaho 83303
Telephone: (208) 733-0700
Facsimile: (208) 735-2444

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

W. Kent Fletcher, ISB #2248
FLETCHER LAW OFFICE
P.O. Box 248
Burley, Idaho 83318
Telephone: (208) 678-3250
Facsimile: (208) 878-2548

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

RECEIVED
OCT 15 2019
DEPT OF WATER RESOURCES
SOUTHERN REGION

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

IN THE MATTER OF APPLICATION)
FOR TRANSFER NO. T83502)
(in the name of J & L Holdings, 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
the J & L HOLDINGS, LLC ("Applicant"). The initial bases for the protests are as follows:

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;

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.

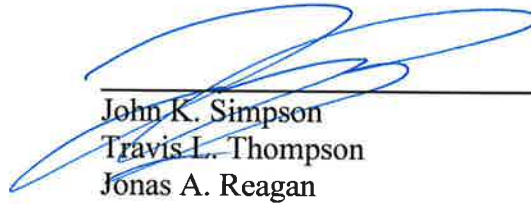
DATED this 15th day of October, 2019.

FLETCHER LAW OFFICE



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

BARKER ROSHOLT & SIMPSON LLP



John K. Simpson
Travis L. Thompson
Jonas A. Reagan

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

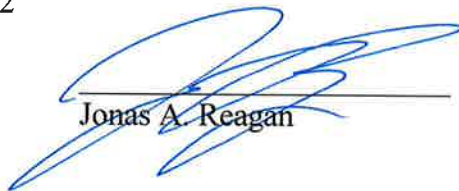
By Hand-Delivery to the following:

Idaho Department of Water Resources
Southern Region
650 Addison Ave W, Ste 500
Twin Falls, ID 83301-5858

And by United States Mail to:

J & L Holdings, LLC
P.O. Box 111
Irwin, Idaho 83428

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.