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Department of Water Resources
Eastern Region

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North Side Canal Company, and Twin Falls
Canal Company*

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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. 83288)
(in the name of LCSC Enterprises 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 RSHOLT & 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
LCSC ENTERPRISES LLC ("Applicant"). The initial bases for the protests are as follows:

Receipt
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1. The Applicant filed successive transfer applications involving the same water right without providing sufficient justification or evidence that such transfers, when evaluated together, would not trigger a mitigation requirement under ESPA analysis; 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 8th day of July, 2019.

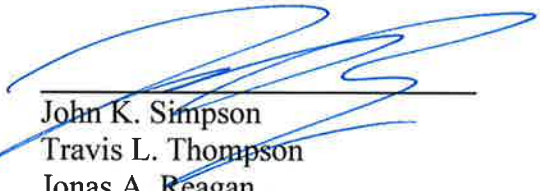
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North Side Canal Company, and Twin Falls
Canal Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July, 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:

LCSC Enterprises LLC
433 Las Colinas Blvd. E
Ste. 1290
Irving, TX 75039-5058

Jason C. Helms,
6755 N. Albert Lane
Idaho Falls, ID 83401


Jonas A. Reagan

FOR OFFICE USE ONLY:

Fees paid: \$50.00 Date: 7/8/2019
Receipt No.: S037423 By: 