

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
JUL 15 2019
Department of Water Resources
Eastern Region
RECEIVED
JUL 08 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. 83315)
(in the name of LCSC Enterprises LLC))
)
)
_____)

NOTICE OF JOINT PROTEST

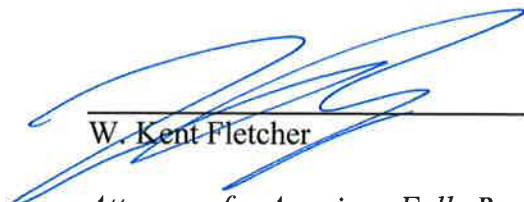
A&B IRRIGATION DISTRICT, BURLEY IRRIGATION DISTRICT, MILNER
IRRIGATION DISTRICT, NORTH SIDE CANAL COMPANY, TWIN FALLS CANAL
COMPANY, AMERICAN FALLS RESERVOIR DISTRICT #2, AND MINIDOKA
IRRIGATION DISTRICT (hereinafter "Protestants"), by and through their attorneys of record,
BARKER ROSHOLT & SIMPSON LLP, and FLETCHER LAW OFFICE, hereby file this
Notice of Joint Protest to the approval of the above-numbered application for transfer filed by
LCSC ENTERPRISES LLC ("Applicant"). The initial bases for the protests are as follows:

Receipt
#5037423

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.

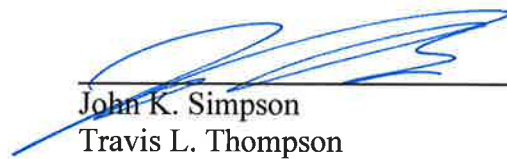
FLETCHER LAW OFFICE



W. Kent Fletcher

*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 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: 