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

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APR 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. 83043)
(in the name of Jacobs Land 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
JACOBS LAND LLC ("Applicant"). The initial bases for the protests are as follows:

1. The Applicant has failed to adequately address enlargement concerns; and

2. The Applicant has failed to adequately address injury concerns by not including required ESPA modeling results; and
3. The application violates the criteria of I.C. § 42-222(1); and
4. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 8th day of April, 2019.

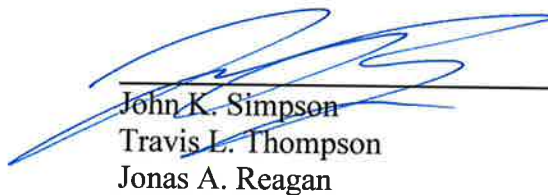
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Canal Company*

CERTIFICATE OF SERVICE

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

Jacobs Land LLC
P.O. Box 119
Hamer, Idaho 83425


Jonas A. Reagan

FOR OFFICE USE ONLY:

Fees paid: \$50.00 Date: 4/8/2019
Receipt No.: S037261 By: 