

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*

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DEPT. OF WATER RESOURCES
SOUTHERN REGION

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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. T82434)
(in the name of LCSC Enterprises LLC))
)
)

NOTICE OF JOINT PROTEST

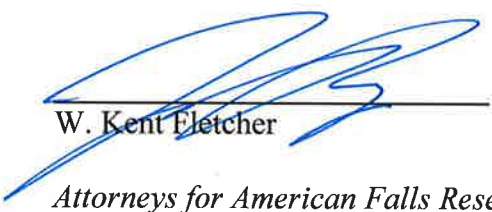
A&B IRRIGATION DISTRICT, BURLEY IRRIGATION DISTRICT, MILNER
IRRIGATION DISTRICT, NORTH SIDE CANAL COMPANY, TWIN FALLS CANAL
COMPANY, AMERICAN FALLS RESERVOIR DISTRICT #2, and MINIDOKA
IRRIGATION DISTRICT (hereinafter "Protestants"), by and through their attorneys of record,
BARKER ROSHOLT & SIMPSON LLP,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

*Receipt
#5036834*

1. The Applicant has failed to provide sufficient evidence about the impacts of the proposed transfer on existing water rights;
2. The application is unclear as to how the Applicant will satisfy the mitigation required to prevent injury to senior right holders;
3. The application fails to provide sufficient information about the history of water use under the water rights listed in the application;
4. The application violates the criteria of I.C. § 42-222(1); and
5. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 9th day of July, 2018.

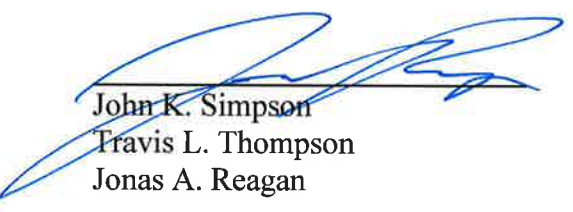
FLETCHER LAW OFFICE



W. Kent Fletcher

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

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North Side Canal Company, and Twin Falls
Canal Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July, 2018, I served a true and correct copy of the foregoing NOTICE OF PROTEST;

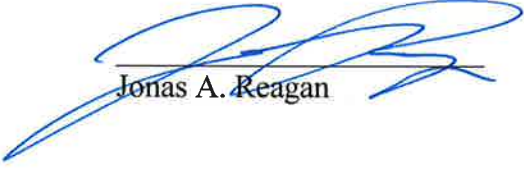
By hand-delivery to the following:

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, Texas 75039-5058

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


Jonas A. Reagan

FOR OFFICE USE ONLY:

Fees paid: \$50.00
Receipt No.: S036836

Date: 7/9/2018
By: 