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

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

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APR 23 2018
DEPT OF WATER RESOURCES
SOUTHERN REGION
RECEIVED
APR 27 2018
Department of Water Resources
Eastern Region

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

IN THE MATTER OF APPLICATION)
FOR PERMIT NO. 22-14308)
(in the name of KLB, Inc.))
)
)
)

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 permit filed by the
KLB, INC. ("Applicant"). The initial bases for the protests are as follows:

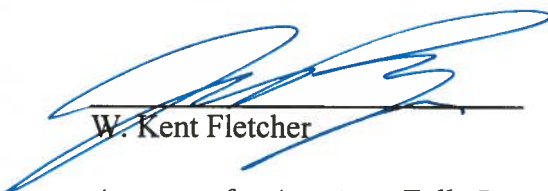
1. The Applicant has failed to demonstrate that the water supply is sufficient for the
diversion of water under this application;

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2. If water is appropriated and diverted as requested by the Applicant, it may cause injury to existing water rights;
3. The Applicant has failed to provide sufficient justification for the requested water quantity of 12.4 cfs for 2936.5 acres;
4. The application is unclear if the water right will be used to irrigate existing or new lands. If approved, IDWR should condition the permit and license to ensure the water right is supplemental and cannot be used for the irrigation of new lands.
5. The application violates the criteria of I.C. § 42-203A(5); and
6. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 23rd day of April, 2018.

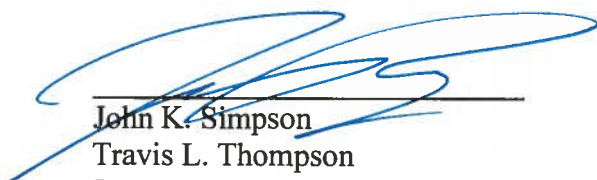
FLETCHER LAW OFFICE



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CERTIFICATE OF SERVICE

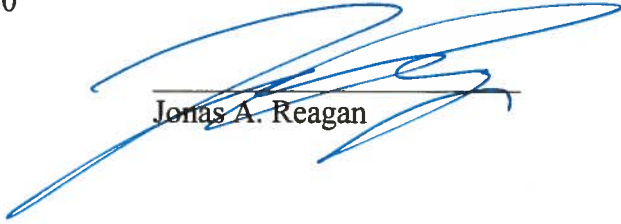
I hereby certify that on this 2nd day of April, 2018, I served a true and correct copy of the foregoing NOTICE OF PROTEST;

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:

KLB, Inc.
c/o John Brown
P.O. Box 579
Rexburg, ID 83440


Jonas A. Reagan

FOR OFFICE USE ONLY:

Fees paid: \$50 .00
Receipt No.: S036704

Date: 4/23/2018
By: 