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

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APR 02 2018

DEPT OF WATER RESOURCES
SOUTHERN REGION
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APR 06 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. 25-14462)
(in the name of HK Contractors 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
HK CONTRACTORS INC. ("Applicant"). The initial bases for the protests are as follows:

1. The Applicant has failed to provide sufficient evidence that the use is a non-
consumptive use to the source: the Eastern Snake Plains Aquifer ("ESPA"); and

Receipt
#5036672

2. Approval of the permit without adequate mitigation will result in injury to the Protestants' senior water rights; and
3. The Applicant has failed to adequately demonstrate why a water use in excess of the domestic exemptions is necessary to fulfil their stated purpose; and
4. The Applicant appears to be filing an application for a storage purpose of use which remains unidentified in the application; and
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 2nd day of April, 2018.

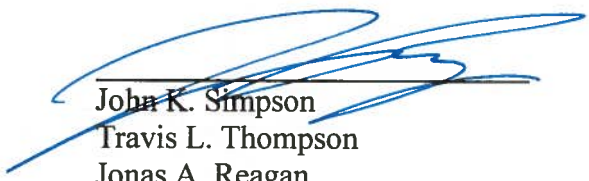
FLETCHER LAW OFFICE



W. Kent Fletcher

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

BARKER ROSHOLT & SIMPSON LLP

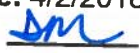


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FOR OFFICE USE ONLY:

Fees paid: \$50.00
Receipt No. S036672

Date: 4/2/2018
By: 

CERTIFICATE OF SERVICE

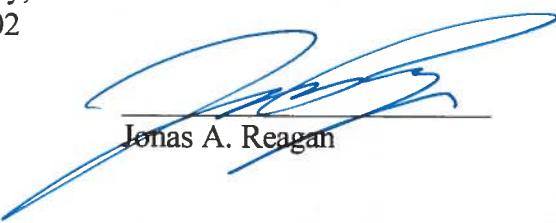
I hereby certify that on this 2nd day of April, 2018, I served a true and correct copy of the foregoing NOTICE OF PROTEST, by hand-delivery to the following:

Idaho Department of Water Resources
Southern Region
650 Addison Ave W, Ste 500
Twin Falls, ID 83301-5858

And by U.S. Mail to:

HK Contractors Inc.
6350 S. Yellowstone Hwy.
Idaho Falls, ID 83402

Rocky Mountain Environmental Associates, Inc.
482 Constitution Way, Ste. 303
Idaho Falls, ID 83402



Jonas A. Reagan