

Randall C. Budge (ISB# 1949)
Thomas J. Budge (ISB# 7465)
RACINE OLSON NYE & BUDGE, CHARTERED
201 E. Center St. / P.O. Box 1391
Pocatello, Idaho 83204-1391
(208) 232-6101 – phone
(208) 232-6109 – fax
rcb@racinelaw.net
tjb@racinelaw.net

Attorneys for Idaho Ground Water Appropriators, Inc.

RECEIVED

FEB 01 2018

Department of Water Resources
Eastern Region

IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF APPLICATION
FOR TRANSFER NO. 82104

NOTICE OF PROTEST

In the name of PANCHERI BROTHERS
LLC.

Idaho Ground Water Appropriators, Inc. (IGWA), by and through counsel, files this Notice of Protest to the above-referenced Application for Transfer under Idaho Code section 42-222. The initial reasons for this protest are:

1. The proposed transfer will injure existing water rights, including but not limited to rights owned by IGWA members.
2. The proposed transfer will constitute an enlargement in use of the transferred water right and/or related water rights.
3. The proposed transfer is inconsistent with the local public interest as defined by Idaho Code § 42-202B.
4. The proposed transfer will adversely affect the local economy of the watershed and/or local area within which the source of water originates.
5. Forfeiture of the water rights being transferred.

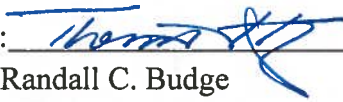
IGWA reserves the right to oppose the Application for other reasons that may subsequently be discovered.

This protest may be resolved by demonstrating to IGWA's satisfaction that the proposed transfer will not constitute an enlargement in use of the transferred water right and/or related water rights.

Receipt - E043697

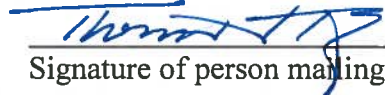
DATED this 30th day of January, 2018.

RACINE OLSON NYE BUDGE
& BAILEY, CHARTERED

By: 
Randall C. Budge
Thomas J. Budge

CERTIFICATE OF SERVICE

I certify that on this the 30th day of January, 2018, the foregoing document was served on the following persons in the manner indicated.


Signature of person mailing form

Idaho Department of Water Resources 900 North Skyline Drive, Suite A Idaho Falls, ID 83402-1718	☒ U.S. Mail/Postage Prepaid ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☐ E-mail
Pancheri Brothers LLC 1460 Hwy 33 Howe, Idaho 83244	☒ U.S. Mail/Postage Prepaid ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☐ E-mail
Rocky Mountain Environmental Associates 482 Constitution Way, Ste 303 Idaho Falls, Idaho 83402 kristin.rmea@gmail.com	☒ U.S. Mail/Postage Prepaid ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☐ E-mail



January 30, 2018

Sharla Cox
Idaho Department of Water Resources
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718

RECEIVED
FEB 01 2018
Department of Water Resources
Eastern Region

Re: Transfer Nos. 82104

Dear Sharla,

Enclosed please find the original and one copy of a Notice of Protest against Transfer Application Nos. 82104 in the name of Pancheri Brothers LLC, together with a check in the amount of \$25.00 for the filing fee. Please file the original and conform stamp the extra copy and return it to me in the enclosed in the enclosed stamped and addressed return envelope.

Thank you for your assistance. Should you have any questions, please give me a call.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. J. Budge', is written over a horizontal line.

T. J. BUDGE