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Attorneys for Idaho Ground Water Appropriators, Inc.

RECEIVED
DEC 29 2017
Department of Water Resources
Eastern Region

IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF APPLICATION
FOR TRANSFER NO. 82051

NOTICE OF PROTEST

In the name of City of Sugar City

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 § 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.

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

DATED this 26th day of December, 2017.

RACINE OLSON NYE & BUDGE,
CHARTERED

By: Thomas J. Budge
Randall C. Budge
Thomas J. Budge

Receipt # E043637

CERTIFICATE OF SERVICE

I certify that on this the 21st day of December, 2017, 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
City of Sugar City P.O. Box 56 Sugar City, Idaho 83448	☒ U.S. Mail/Postage Prepaid ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☐ E-mail
Rocky Mountain Environmental Associates, Inc. 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



RACINE OLSON

ATTORNEYS

December 15, 2017

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

RECEIVED

DEC 29 2017

Department of Water Resources
Eastern Region

Re: Transfer Nos. 82051

To Whom It May Concern,

Enclosed please find the original and extra copy of a Notice of Protests against Transfer Application No. 82051. A check in the amount of \$25.00 is enclosed for the filing fee. Please file the original and conform stamp the extra copy and return it to me in the enclosed stamped and addressed return envelope.

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

Sincerely,



T.J. BUDGE