

RECEIVED

FEB 10 2017

DEPT OF WATER RESOURCES
SOUTHERN REGION

RECEIVED

FEB 16 2017

Department of Water Resources
Eastern Region

John K. Simpson, ISB #4242
Travis L. Thompson, ISB #6168
Paul L. Arrington, ISB #7198
BARKER ROSHOLT & SIMPSON LLP
163 Second Avenue West
P.O. Box 63
Twin Falls, Idaho 83303
Telephone: (208) 733-0700
Facsimile: (208) 735-2444

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*

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

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

IN THE APPLICATION FOR TRANSFER
OF WATER RIGHT NO. T81384

In the names of Global Ag Properties II USA,
LLC

NOTICE OF PROTEST

A&B IRRIGATION DISTRICT, AMERICAN FALLS RESERVOIR DISTRICT #2,
BURLEY IRRIGATION DISTRICT, MILNER IRRIGATION DISTRICT, MINIDOKA
IRRIGATION DISTRICT, NORTH SIDE CANAL COMPANY and TWIN FALLS CANAL
COMPANY (the "Coalition" or "Protestants"), by and through their attorneys of record, file this
Notice of Protest to the approval of the above-numbered *Application for Transfer of Water Rights*
filed by GLOBAL AG PROPERTIES II USA, LLC (the "Applicant").

As to the present application, the initial bases for protest are as follows:

1. The groundwater right subject to this transfer was originally developed as a
supplemental groundwater right for use in association with shares of the Peoples Canal & Irrigation
Company Water ("Peoples"). Through this transfer, the applicant will use Peoples' water on the

current property and the groundwater on separate property – resulting in an expansion of water use.

2. The Application has failed to demonstrate that the transfer will not injure existing water rights and has failed to provide any proposed mitigation to offset impacts resulting from the transfer.

3. The Applicant has failed to show that the Application meets the criteria required by Idaho Code §§ 42-222.

4. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

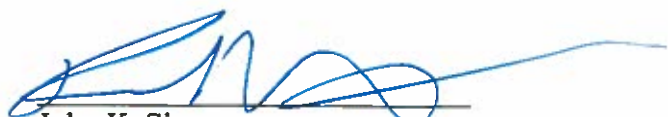
DATED this 10th day of February, 2017.

FLETCHER LAW OFFICE


W. Kent Fletcher

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

BARKER ROSHOLT & SIMPSON LLP


John K. Simpson
Travis L. Thompson
Paul L. Arrington

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

CERTIFICATE OF SERVICE

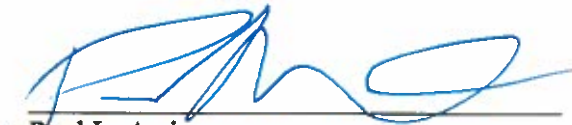
I hereby certify that on this 10th day of February, 2017, I served a copy of the foregoing

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:

Global Ag Properties II USA, LLC
2004 Fox Dr., Ste. L
Champaign, IL 661820


Paul L. Arrington

FOR OFFICE USE ONLY

Fee: \$175.00 (each)

Receipt No.: S035937

Date Received: 2/10/2017

By: 