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DEPT OF WATER RESOURCES
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Department of Water Resources
Eastern Region

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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 MATTER OF APPLICATION FOR
PERMIT NO. 35-14467

NOTICE OF PROTEST

In the names of Gold Emblem Farms

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 "Protestants"), by and through their attorneys of record, file this *Notice of Protest*
to the approval of the above-numbered *Application for Permit* filed by GOLD EMBLEM FARMS
(the "Applicant").

The initial bases for the protest are as follows:

1. The Applicant has failed to demonstrate that the water supply is sufficient for the diversion of water under this application.
2. The Applicant proposes to mitigate for new consumptive uses through a temporary lease agreement with Areva. However, Applicant has failed to provide any information regarding

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Receipt
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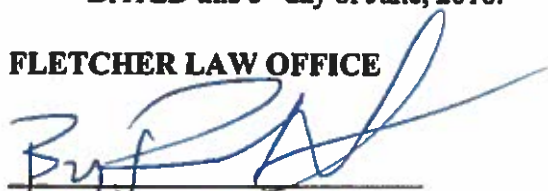
the proposed mitigation, including any agreement to lease the Areva water, the term of the lease, the conditions of the lease and alternative sources of mitigation in the event the Areva lease is not available for mitigation. A review of Department records for water right 35-13855 (the Areva water right) shows that a lease to Gold Emblem Farms was denied by the Water Supply Bank. A new water right based upon a temporary lease is speculation by the applicant that a source of mitigation will be available.

3. The Applicant has failed to show that the Application meets the criteria required by Idaho Code §§ 42-203A.

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

DATED this 6th day of June, 2016.

FLETCHER LAW OFFICE


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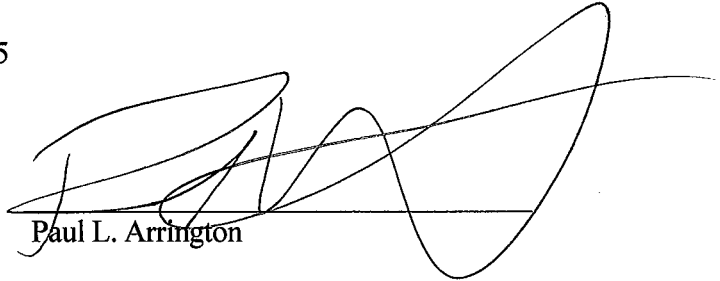
CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of June, 2016, I served a copy of the foregoing NOTICE
OF PROTEST, by hand-delivery to the following:

Idaho Department of Water Resources
Idaho Water Center
322 East Front Street
Boise, Idaho 83702-7374

And by U.S. Mail to:

Gold Emblem Farms
P.O. Box 51780
Idaho Falls, ID 83405



Paul L. Arrington