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DEPARTMENT OF
WATER RESOURCES

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Attorney for Idaho Power 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 name of Gold Emblem Farms

Idaho Power Company ("Protestant"), by and through its 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 application proposes to divert Trustwater and fails to comply with the moratorium and conditions for approval.
2. The Applicant proposes to mitigate for new consumptive uses under the above water right through a temporary lease agreement with Areva. However, Applicant has failed to provide any information regarding the proposed mitigation, including any agreement to lease the Areva water. 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

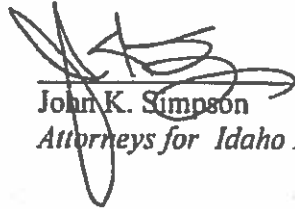
NOTICE OF PROTEST

*Receipt
#C102115*

on this matter.

DATED this 6th day of June, 2016.

BARKER ROSHOLT & SIMPSON LLP



John K. Simpson
Attorneys for Idaho Power Company

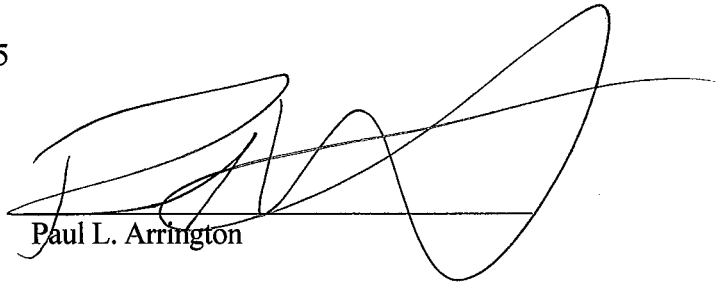
CERTIFICATE OF SERVICE

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