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Attorneys for Idaho Power Company

RECEIVED

JUN 22 2015

DEPARTMENT OF
WATER RESOURCES

RECEIVED

JUN 25 2015

DEPT OF WATER RESOURCES
SOUTHERN REGION

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

IN THE MATTER OF APPLICATION FOR
PERMIT NO. 37-22951

In the name of Rotarun Ski Club Inc.

NOTICE OF PROTEST

IDAHO POWER COMPANY (the "Protestant"), by and through its attorneys of record, files this *Notice of Protest* to the approval of the above-numbered *Application for Permit* filed by ROTARUN SKI CLUB INC. (the "Applicant").

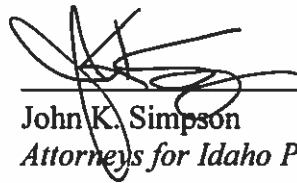
The initial bases for the protest are as follows:

1. This application for permit seeks to divert 0.09 cfs of groundwater from November 1 to February 28 from two existing wells located approximately 2.0 miles west and 1.5 miles south of the intersection of Main and Bullion Streets in Hailey into an existing 2.4 acre-foot storage reservoir where the water will be pumped out for commercial use from November 1 through February 28. The application further seeks to maintain the 2.4 acre-feet of storage in the reservoir from January 1 through December 31 for fire protection. The commercial use of 8.0 acre-feet is for snow making at the Rotarun Ski area and allows for multiple fills and releases from the reservoir.

2. The source of groundwater is located within Water District 37 and has been recognized as trustwater by the State of Idaho as defined in IDAPA 37.03.08.031(a) and should reference conditions on the exercise of this right.
3. And for such other and further reasons as may be discovered or set forth at the hearing on this matter. Protestant reserves the right to amend this Protest as necessary.

DATED this 22nd day of June, 2015.

BARKER ROSHOLT & SIMPSON LLP

A handwritten signature in black ink, appearing to read "John K. Simpson", is written over a horizontal line.

John K. Simpson
Attorneys for Idaho Power Company

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2015, I served the original of the foregoing **NOTICE OF PROTEST**, by hand-delivering or depositing same in the U.S. Mail, postage prepaid, as indicated, addressed to the following:

Idaho Department of Water Resources
322 East Front Street
Boise, ID 83720

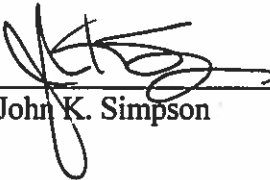
☐ U.S. Mail, Postage Prepaid
☒ Hand Delivery
☐ Overnight Mail
☐ Facsimile
☐ Email

Rotarun Ski Club Inc.
P.O. Box 2083
Hailey, ID 83333

☒ U.S. Mail, Postage Prepaid
☐ Hand Delivery
☐ Overnight Mail
☐ Facsimile
☐ Email

Zack Latham
Brockway Engineering, PLLC
2016 N. Washington Street, Suite 4
Twin Falls, ID 83301

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☐ Hand Delivery
☐ Overnight Mail
☐ Facsimile
☐ Email



John K. Simpson