

VOLK LAW, PLLC  
PETER A. VOLK

P.O. Box 9264  
Moscow, ID 83843

June 5, 2015

Idaho Department of Water Resources, Eastern Region  
900 N. Skyline Dr.  
Suite A  
Idaho Falls, Idaho 83402  
**SENT VIA CERTIFIED MAIL**

Bryce W. Crane  
244 Smith Center Rd.  
Montpelier, Idaho 83254  
**SENT VIA CERTIFIED MAIL**

Smith Drue  
305 Smith Lane  
Montpelier, Idaho 83254  
**SENT VIA CERTIFIED MAIL**

RECEIVED  
JUN 09 2015  
Department of Water Resources  
Eastern Region

**STATE OF IDAHO DEPARTMENT OF WATER RESOURCES NOTICE OF PROTEST**

This form may be used to file a protest with the department under sections 42-108B, 42-203A, 42-203C, 42-211, and 42-222, Idaho Code. The department will also accept a timely protest not completed on this form if it contains the same information.

1. **Matter being protested:** Transfer Numbers 80080 and 80077 in the name of Bryce W. Crane.
2. **Name of protestant:** Redwood Farmland Holdings, L.L.C., a Maryland limited liability company
3. **Protestant's Representative for service** (If different than protestant): Volk Law, PLLC, Peter Volk, attorney.
4. **Service mailing address:** P.O. Box 9264, Moscow, Idaho 83843
5. **Service telephone no.** 208-882-5982 **Email Address:** PeteVolkLaw@gmail.com
6. **Basis of protest:** The change in the point of diversion of water right number 11-7047 described in Transfer Number 80077 and the change in the place of beneficial use of water rights numbers 11-7047 and 11-4208 described in Transfer Numbers 80080 and 80077 will reduce available flow of protestant's water rights

Rec'd  
#2041124

numbers 11-2045(priority date 5-7-1912) and 11-2155 (priority date 9-12-1958). It being reasonably understood that the water in this case has hydrological connection between the proposed transfers and the water rights of the protestant. This connection, and withdraw by the applicants for transfer, will result in reduced flows which will decrease water available for irrigation use to an amount which is below the protestant's permitted amounts.

7. **What would resolve your protest?** Further factual information provided from the applicant for transfer that reasonably supports the hydrological conclusion that the transfer will not reduce the flow rate of protestant's water rights. If such information can not be provided, or developed over time, to the satisfaction of protestant then the transfer should be denied.

I hereby, acknowledge that if I, or my designated representative, fail to appear at any regularly scheduled conference or hearing in the matter of which I have been notified at the address above, the department may issue a notice of proposed default against me in this matter for failure to appear. I also verify that I have served a copy of this protest upon the applicant.

Signed this 5<sup>th</sup> day of June, 2015.

Redwood Farmland Holdings, Protestant

By: \_\_\_\_\_

Peter Volk, its authorized attorney and Representative

\_\_\_\_\_, Protestant's Representative

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Department of Water Resources  
Eastern Region

June 8, 2015

Idaho Department of Water Resources, Eastern Region  
Attention: Sharla  
900 N. Skyline Dr.  
Suite A  
Idaho Falls, Idaho 83402

Re: Fee for protest of Transfer Numbers 80080 and 80077.

Dear Sharla:

In accordance with or phone conversation this morning, please find enclosed \$50.00 as the administrative fee for the above referenced protests of water rights transfers.

Please mark our protest fees as paid and feel free to call with any further questions or comments you may have.

Best wishes,



Peter Volk