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DEPT OF WATER RESOURCES
SOUTHERN REGION

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*Attorneys for Thousand Springs Water
Users Association, Inc.*

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

IN THE MATTER OF APPLICATION)
FOR TRANSFER NO. 79498)
(in the name of IGWA))
)

)

NOTICE OF PROTEST

THOUSAND SPRINGS WATER USERS ASSOCIATION, INC. (hereinafter
“Protestant”), by and through its attorneys of record, hereby file this *Notice of Protest* to the
approval of the above-numbered application for transfer filed by the Idaho Ground Water
Appropriators, Inc. (“Applicant”). The initial bases for the protests are as follows:

1. The Applicant has failed to provide sufficient evidence regarding the effects of
the proposed transfer and whether or not it will result in an enlargement of the water rights.
2. The Applicant has failed to provide sufficient evidence regarding the effects of
the proposed transfer and whether or not it will result in injury to other water rights.
3. The application fails to set forth sufficient information regarding the permissions
or legal right to move water to the proposed place of use.

4. The application fails to set forth sufficient information and analyses required under IDWR's *Transfer Processing Memo. No. 24* (dated December 21, 2009).

5. The application violates the criteria of I.C. § 42-222(1).

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

DATED this 6th day of September, 2014.

BARKER ROSHOLT & SIMPSON LLP



Travis L. Thompson

*Attorneys for Thousand Springs Water Users
Association, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of September, 2014, I served a true and correct copy of the foregoing *Notice of Joint Protest*, by depositing same in the United States mail, postage prepaid, addressed to the following:

Randy Budge
T.J. Budge
RACINE OLSON
P.O. Box 1391
Pocatello, Idaho 83204

FOR OFFICE USE ONLY

Fee: \$25.00

Receipt No. 5034286

Receipt by: Am

Date Received: 9-8-2014



Travis L. Thompson

NOTICE OF PROTEST