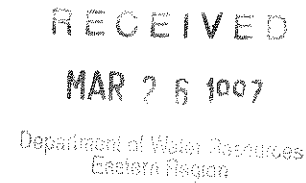
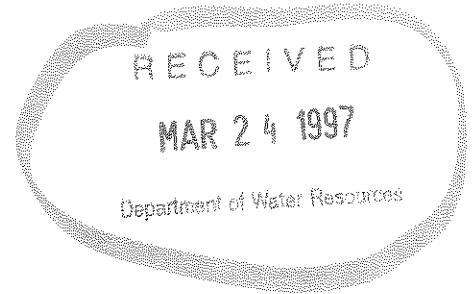


Jeffrey C. Fereday
Michael C. Creamer
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277 North Sixth Street, Suite 200
P.O. Box 2720
Boise, Idaho 83701-2720
Telephone: 208-388-1200
Facsimile: 208-388-1201

Attorneys for Protestant,
Idaho Groundwater Appropriators, Inc.



BEFORE THE DIRECTOR

STATE OF IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION
FOR PERMIT TO APPROPRIATE
PUBLIC WATERS.

Application No. 01-07128

PROTEST

Protestant, the Idaho Groundwater Appropriators, Inc. ("IGWA"), by and through the undersigned counsel, and pursuant to Idaho Code § 42-203A, hereby protests approval of Idaho Power Company's ("Idaho Power") Application for Permit No. 01-07128 (the "Application") as submitted. The grounds for IGWA's Protest are as follows:

1. IGWA represents individual water right owners and organizations whose members own rights to use groundwater that may be materially injured by Idaho Power's proposed use;

2. Idaho Power's proposed use may reduce the quantity of water to which IGWA's members are entitled under their existing water rights;

PROTEST-1

3. Idaho Power's proposed use is such that the water supply may be insufficient for the purpose for which Idaho Power seeks to appropriate it;

4. Idaho Power's proposed use will conflict with the local public interest and adversely affecting the affairs of IGWA's members and other people in the area directly affected by the proposed use; and

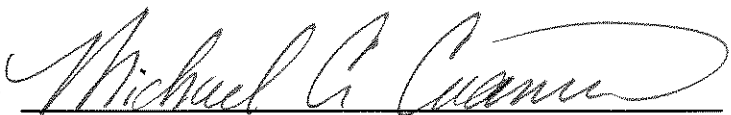
5. Idaho Power's proposed use is contrary to conservation of water resources within the State of Idaho.

IGWA reserves the right to state additional grounds for its protest as facts become known through discovery or otherwise.

For the foregoing reasons, IGWA requests that Application No. 01-07128 filed by Idaho Power Company be denied or, alternatively, that it be granted only on conditions that will protect the water rights of others and the public.

DATED this 24th day of March, 1997.

GIVENS PURSLEY & HUNTLEY, LLP

By 

Michael C. Creamer
Attorneys for Protestant,
Idaho Groundwater Appropriators, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 1997, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Power Company
P. O. Box 70
Boise, Idaho 83702

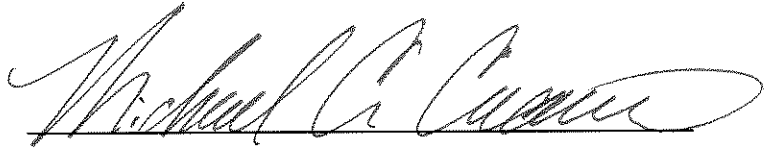
☐ HAND DELIVER
☒ U.S. MAIL
☐ OVERNIGHT MAIL
☐ TELECOPY (FAX)

James C. Tucker
Rosholt Robertson & Tucker, Chartered
P. O. Box 1906
Twin Falls, Idaho 83303

☐ HAND DELIVER
☒ U.S. MAIL
☐ OVERNIGHT MAIL
☐ TELECOPY (FAX)

Karl J. Dreher, Director
Idaho Department of Water Resources
1301 North Orchard
Boise, Idaho 83706

☒ HAND DELIVER
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ TELECOPY (FAX)



RECEIPT
For Monies Paid
to the
Idaho Department of Water Resources



Receipt No: C038410

Date: 3/24/1997
Time: 15:22:59

RECEIVED
MAR 26 1997
Department of Water Resources
Eastern Region

Received

From: GIVENS, PURSLEY & HUNTLEY

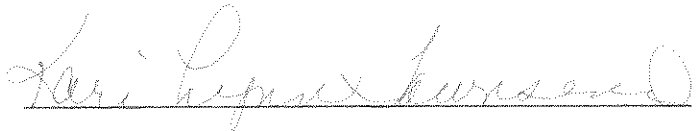
Type of Payment	Program A cct	Amount
PROTEST APPLICATION # 01-07128	56103 229 21 1155	25.00

Total \$ 25.00

CHECK 10939

Region: STATE

Signature:



MAR 24 1997

LAW OFFICES

GIVENS PURSLEY & HUNTLEY, LLP

A LIMITED LIABILITY PARTNERSHIP

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P.O. Box 2720 • BOISE, IDAHO 83701
(208) 388-1200
FACSIMILE (208) 388-1201

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MAR 24 1997

Department of Water Resources

March 24, 1997

GARY G. ALLEN
JOSEPH H. BAIRD
CHRISTOPHER J. BEESON
MICHAEL C. CREAMER
ROY L. EIGUREN
JEFFREY C. FEREDAY
JULIE KLEIN FISCHER
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L. EDWARD MILLER
PATRICK J. MILLER
JUDSON B. MONTGOMERY
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OF COUNSEL

VIA HAND DELIVERY

Karl J. Dreher, Director
Idaho Department of Water Resources
1301 North Orchard
Boise, Idaho 83706

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MAR 26 1997

Department of Water Resources
Eastern Region

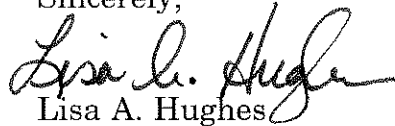
Re: Protest (Application No. 01-07128
Our File: 3915-22

Dear Mr. Dreher:

Enclosed for filing you will find an original and two copies of the Protest with regard to Application No. 01-07128. I have also enclosed a check in the amount of \$25.00 which should cover the application fee. Please conform one copy and retain the other for your records.

Thank you for your assistance in this matter and should you have any questions please do not hesitate to give me a call.

Sincerely,



Lisa A. Hughes
secretary to Karl T. Klein

:lah
Enclosures