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Attorneys for Idaho Ground Water Appropriators, Inc.

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JAN 04 2024

Department of Water Resources
Eastern Region

IDAHO DEPARTMENT OF WATER RESOURCES

IN THE MATTER OF APPLICATION
FOR TRANSFER NO. 88699

In the name of FARMLAND RESERVE,
INC.

IGWA'S NOTICE OF PROTEST

Idaho Ground Water Appropriators, Inc. (IGWA), by and through counsel, files this notice of protest under Idaho Code section 42-222 to the above-referenced application for transfer of water right nos. 35-14240, 35-14241, 35-14242, 35-14243, and 35-14655. The initial reasons for this protest are:

1. The proposed transfer will injure existing water rights owned by IGWA members.
2. The proposed transfer will constitute an enlargement in use of the transferred water right and/or related water rights.
3. The proposed transfer is inconsistent with the local public interest as defined by Idaho Code § 42-202B.
4. The proposed transfer will adversely affect the local economy of the watershed and/or local area within which the source of water originates.

IGWA reserves the right to oppose the application for other reasons that may subsequently be discovered.

This protest may be resolved by demonstrating to IGWA's satisfaction that the proposed transfer satisfies Idaho Code section 42-222.

DATED this 2nd day of January, 2024.

RACINE OLSON, PLLP

FOR OFFICE USE ONLY

FEES PAID: \$25.00 **DATE:** 1/4/24
RECIPT NO.: E049715 **BY:** CH

By: Thomas J. Budge
Thomas J. Budge

CERTIFICATE OF SERVICE

I certify that on this the 2nd day of January, 2024, the foregoing document was served on the following persons in the manner indicated.


Signature of person mailing form

Idaho Department of Water Resources 900 North Skyline Drive, Suite A Idaho Falls, ID 83402-1718	☒ U.S. Mail/Postage Prepaid ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☐ E-mail
Farmland Reserve, Inc. 79 S. Main, Suite 1000 Salt Lake City, Utah 84111 jcobell@cffarms.com	☒ U.S. Mail/Postage Prepaid ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☒ E-mail
Robert L. Harris HOLDEN, KIDWELL, HAHN & CRAPO, P.L.L.C. PO Box 50130 Idaho Falls, ID 83405-0130 rharris@holdenlegal.com	☒ U.S. Mail/Postage Prepaid ☐ Facsimile ☐ Overnight Mail ☐ Hand Delivery ☒ E-mail



January 2, 2024

Idaho Department of Water Resources
900 North Skyline Drive, Suite A
Idaho Falls, ID 83402-1718

Re: Transfer Nos. 88699

To whom it may concern,

Enclosed please find the original Notice of Protest against Transfer Application No. 88699 in the name of Farmland Reserve, Inc., together with a check in the amount of \$25.00 for the filing fee.

Thank you for your assistance. Should you have any questions, please give me a call.

Sincerely,

A handwritten signature in dark ink, appearing to read 'T. J. Budge', is written over a horizontal line.

T. J. BUDGE

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Eastern Region