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DEPT. OF WATER RESOURCES
SOUTHERN REGION

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Attorneys for Big Wood Canal Company

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

IN THE MATTER OF APPLICATION FOR
TRANSFER NO. 90199 in the name of KNIFE
RIVER CORPORATION MOUNTAIN WEST

NOTICE OF PROTEST

BIG WOOD CANAL COMPANY ("BWCC" or "Protestant"), by and through its attorneys of record, hereby files this *Notice of Protest* to the approval of the above-numbered *Application for Transfer* filed by KNIFE RIVER CORPORATION MOUNTAIN WEST ("Applicant").

The initial bases for protest are as follows:

1. The Applicant failed to provide sufficient evidence about the impacts of the proposed transfer on existing water rights;
2. The Applicant is unclear as to how it will satisfy the mitigation required to prevent injury to senior water right holders;
3. The Applicant failed to provide sufficient information about the history of water use under the water right listed in the application;
4. The Applicant failed to show that the Application meets the criteria required by Idaho Code § 42-222.

5. For such other and further reasons as may be discovered.

DATED this 2nd day of April, 2026.

PARSONS BEHLE & LATIMER

A handwritten signature in cursive script that reads "Abby R. Bitzenburg".

Norman M. Semanko
Abby R. Bitzenburg

Attorney for Big Wood Canal Company

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April, 2026, I served a copy of the foregoing NOTICE
OF PROTEST, by hand-delivery to the following:

Idaho Department of Water Resources
Southern Region
650 Addison Ave W, Ste 500
Twin Falls, Idaho 83301-5858

And by U.S. Mail to:

Knife River Corporation Mountain West
5450 W. Gowen Rd.
Boise, ID 83709-5625

Rocky Mountain Environmental Associates, Inc.
482 Constitution Way Ste. 303
Idaho Falls, ID 83402



Abby R. Bitzenburg

Received by: S. George
Receipt amt. \$25.00
Receipt No. S041017
Date. 4-2-2026