

WHITE POW

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MAY 13 2026

DEPT. OF WATER RESOURCES
EASTERN REGIONSTATE OF IDAHO
DEPARTMENT OF WATER RESOURCES

APPLICATION FOR TRANSFER OF WATER RIGHT

GENERAL INFORMATION AND INSTRUCTIONS

Pursuant to Section 42-222(1), *Idaho Code*, a transfer application may be filed to change the point of diversion, place of use, period of use, or nature of use of all or part of an established water right. Any person proposing to make such a change is required to file a transfer application with the Department. "Such application shall be upon forms furnished by the department and shall describe the [water right] to be changed and the changes which are proposed and shall be accompanied by the statutory filing fee." *Idaho Code* § 42-222(1).

The Department has developed this application form to assist applicants in satisfying the requirements of Section 42-222(1). This application form requests information about the applicant's authority to file (Part 1), information about the current elements of the water right(s) to be changed (Part 2), information about the proposed changes (Part 3), information about the validity of the water right(s) and the effects of the proposed changes (Part 4), and confirmation that the information provided is truthful (Part 5).

The applicant or their representative must provide a response for all applicable questions, any additional information required, and the proper filing fee before this application will be considered complete. If an application is incomplete or more information is required, the Department will notify the applicant or representative and allow time for the application to be completed. An application that remains incomplete will be returned to the applicant and the filing fee will be refunded.

An application for transfer is limited to the changes proposed for a single water distribution system. A proposal to change two or more separate water distribution systems, that will remain separate after the transfer, must be filed as separate applications. Applicants may provide additional pages to supplement their responses to the questions posed on this application form. Supplemental forms for listing additional water rights, points of diversion, or places of use can be found on the Department's website (idwr.idaho.gov). If you need assistance understanding the questions on this form, generating current water right reports, determining legal descriptions, or accessing water measurement records feel free to contact the nearest regional office of the Department.

PART 1 – CONTACT INFORMATION, OWNERSHIP RECORDS, AUTHORITY TO FILE

Name(s) of Applicant(s) Paula Parks Farms, LLC; Alan Parks and Nicole ParksMailing Address 927 West 200 North, Blackfoot, ID 83221Email* alan@parkfarms.us Phone (208) 681-9404Name of Representative (if any) Robert L. HarrisMailing Address HKHC, PO Box 50130, Idaho Falls, ID 83402Email* rharris@holdenlegal.com Phone 208-523-0620

*If an email address is provided, Department staff will use email as the primary method for corresponding with the applicant and representative about the application.

A. Representative. If the representative is authorized to sign or amend the application on behalf of the applicant, attach documents confirming that authority. Label documents as Attachment 1A.

B. Current Owner. If the applicant is not the current owner of record for all water rights included in this application, attach documents showing that the applicant has the authority to make the proposed changes. Label documents as Attachment 1B.

C. Updating Ownership Records. Applicants needing to update the ownership records for any of the water rights included in this application must attach documents supporting the ownership change. Such documents must trace ownership of the subject water rights or the current place of use for the subject water rights from the current owner of record for the water rights to the applicant. Label documents as Attachment 1C.

D. Business Entities. If the applicant is a business entity (corporation, LLC, partnership, trust, etc.), is the entity currently registered with the Idaho Secretary of State?

☒ Yes. If this application is signed by someone other than a person listed on the most recent annual report filed with the Idaho Secretary of State, attach documents confirming the authority of the signer to sign on behalf of the business entity. Label documents as Attachment 1D.

☒ No. Attach documents confirming the authority of the signer to sign on behalf of the business entity. Label documents as Attachment 1D.

E. Approval of Irrigation Delivery Entity. Section 42-108, *Idaho Code*, states that a transfer application proposing to change water rights held by an irrigation company or district requires the consent of the irrigation entity. If this application proposes to change water rights held by an irrigation entity, attach a letter of consent from the entity (labeled as Attachment 1E) or have an authorized representative of the entity co-sign the application.

F. Encumbered Properties. If the current place of use for the water rights included in this application is subject to a lien, deed of trust, mortgage, or contract and the application proposes to change the nature of use of the water rights or to move water rights off the current place of use, attach a statement of consent for the change signed by the lien holder, trustee, mortgagor or contract holder. Label documents as Attachment 1F.

G. Legal Access. If the applicant is not the current owner of the proposed point(s) of diversion, conveyance system, or place(s) of use, provide evidence of legal access to the land or infrastructure not owned by the applicant. Label documents as Attachment 1G. For example, an applicant may provide a letter of consent from the owner of the land or conveyance system or may have the owner co-sign the application. For applications proposing to divert water on or convey water across federal land, an applicant is not required to demonstrate legal access to the federal land prior to approval. Instead, if the transfer application is approved, the applicant must obtain access authorization from the relevant federal agency prior to diverting water under the subject water rights.

PART 2 – WATER RIGHTS BEFORE PROPOSED CHANGES

A. Current Water Rights. For each water right proposed to be changed, attach a current water right report obtained from any Department office or from the Department's website (idwr.idaho.gov). Label water right reports as Attachment 2A.

B. Map of Current System. Attach a map of the current point(s) of diversion and place(s) of use for the water rights to be changed. The map should clearly depict the elements of the water rights to be changed. For example, if the application proposes to change the point of diversion for a water right, the map should display the current location of the point of diversion. For irrigation water rights, the map should also identify the location of the irrigated acres to be changed. Label map as Attachment 2B.

C. Current Location of Irrigated Acres. If this application proposes to change the place of use or nature of use for only a portion of an irrigation water right, use the following table to identify the current location of the irrigated acres to be changed. If additional pages are required, label additional pages as Attachment 2C. If this application proposes to change or rearrange the entire place of use for irrigation water right(s), skip to Part 3.

☒ **N/A.** This application does not propose to change the place of use or nature of use of an irrigation water right or this application proposes to change the place of use or nature of use for an entire irrigation right.

Current Location of Irrigated Acres to be Changed

Twp	Rge	Sec	NE ¼				NW ¼				SW ¼				SE ¼				Acre Totals
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	

Total Irrigated Acres to be Changed: _____

PART 3 – DESCRIPTION OF PROPOSED CHANGES

A. Purpose of Transfer. Section 42-222(1), *Idaho Code*, states that transfer applications may only be filed to change the point of diversion, place of use, period of use, or nature of use of an established water right. Section 42-248(3), *Idaho Code*, authorizes water right ownership changes to be described on a transfer application. Identify the changes proposed in this application:

- | | |
|---|---|
| ☐ Change point(s) of diversion | ☒ Change place of use |
| ☐ Add point(s) of diversion | ☐ Change period of use |
| ☐ Change nature of use | ☐ Update water right ownership records |

B. Proposed Changes. Describe the proposed changes in narrative form:

This transfer is one of three transfers to cover acres under individual isolated irrigation systems.

This transfer proposes to simply define the POU of what is left of WR 35-4263 after portions of this right have been moved in 2 other transfers. The end result will be a place of use of 153.4 acres for WR 35-4263.

C. Summary of Proposed Changes.

1. Water Rights. Use the following table to list all water rights, or portions thereof, that are proposed to be changed as they would appear after the proposed changes. In the Amount column, list the volume in acre-feet (af) for storage uses or the rate in cubic feet per second (cfs) for all other uses.

All or Part	Right Number	Amount (cfs/af)	Nature of Use	Period of Use	Source
☐ ☒	35-4263	1.64/613.6	Irrigation	04/01 to 10/31	Ground water
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	
☐ ☐				to	

2. Total Amounts. Calculate the total quantity, in cfs or af, of water rights that are proposed to be changed through this application. For an application proposing to only change the place of use for irrigation rights, the total quantity of water is calculated by comparing the current place of use to the proposed place of use, summing the number of acres increased in each legal subdivision, and quantifying the proportional amount of diversion rate for the increased acres. For an application proposing to change or add points of diversion for irrigation or any other beneficial use, the total amount is the total diversion rate for the changed portion of the right.

Total Amount of Water Rights Proposed to be Changed: 1.64 cfs and/or 613.6 af.

3. Point(s) of Diversion. Use the following table to list all the proposed points of diversion for the water rights to be changed, including any current points of diversion that will continue to be used as part of the proposed water distribution system.

The legal description for the proposed point(s) of diversion must be to the nearest 40-acre subdivision (QQ) or U.S. Government Lot of the Public Land Survey System (PLSS). PLSS information is typically available from USGS topo maps, property deeds, tax bills or various mapping tools on the Department's website.

For points of diversion within platted subdivisions, list the lot and block number in the "Diversion Name/Number" column. An application proposing an injection into a stream and a re-diversion from that stream must list the source for the original diversion as the source for the injection and re-diversion points. If this application proposes construction of a new diversion structure (for example, a new ground water well or a new pump station on a creek), please indicate the status in the appropriate column.

☒ N/A. This application does not propose to add or change any points of diversion.

Proposed Points of Diversion

New?	Twp	Rge	Sec	Lot	1/4	1/4	1/4	County	Source	Diversion Name/Number

4. Place of Use. The proposed place of use must be described to the nearest 40-acre subdivision (QQ) or U.S. Government Lot of the Public Land Survey System. Government lot numbers can be noted in parenthesis below the approximate quarter-quarter location of the government lot. For water rights held by irrigation districts, municipal providers or irrigation companies, the proposed place of use may be generally described as authorized by Sections 42-202B, 42-219 and 42-222B, *Idaho Code*.

☐ N/A. This application does not propose to change the place of use.

Proposed Place of Use

Twp	Rge	Sec	NE ¼				NW ¼				SW ¼				SE ¼				Acre Totals
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	
02S	34E	17			33	30									38	39	6.4	7	153.4

Total Irrigated Acres: 153.4

5. Map of Proposed System. Attach a map showing the location of the points of diversion, reservoirs, dams, canals, ditches, pipelines and other works proposed to divert and convey water. Also show the location of the place of use, including any lands to be irrigated. The map should delineate the legal subdivisions including townships, ranges, sections, quarter-quarters and government lots. Label map as Attachment 3C.

PART 4 – ADDITIONAL INFORMATION

Section 42-222(1), *Idaho Code*, establishes the criteria used to evaluate transfer applications. An applicant bears the burden of demonstrating that the water right to be changed is a valid right, that the proposed use is a beneficial use, and that the proposed changes will not injure other water rights, will not enlarge the use of the original rights, are in the local public interest, and are consistent with the conservation of water resources within the state of Idaho. To satisfy this burden, an applicant must provide sufficient data and information for the

Department to evaluate the effects of the proposed change. The Department may deny an application if the applicant fails to provide sufficient data and information to determine whether the criteria from Section 42-222(1) are satisfied. In addition to the information requested in Parts 1-3 of this application, the following information must be provided for an application to be considered complete. Department staff may request additional information or clarification as the application is processed.

A. Validity of Water Rights

1. If one or more of the water rights proposed to be changed is a statutory claim, established pursuant to Section 42-248, *Idaho Code*, attach evidence supporting the priority date claimed. Label documents as Attachment 4A-1. For statutory claims, the Department may conduct a field inspection as part of the application review process to evaluate the water right elements listed on the statutory claim.

2. Has any portion of the water right(s) proposed to be changed undergone a period of five or more consecutive years of non-use?

☐ Yes. Attach a statement describing the portion of the right(s) that were not used and the length of time of the non-use. In addition, identify any exception or defense to forfeiture and provide a detailed description as to why the water rights have not been lost and forfeited for non-use. Label documents as Attachment 4A-2. Statutory exceptions or defenses to forfeiture are set forth in Section 42-223, *Idaho Code*.

☒ No.

B. Injury to Other Water Rights

1. Identify any other water right(s) diverted at the current point(s) of diversion.

None

2. Identify any other water right(s) diverted at the proposed point(s) of diversion.

None

3. Is the proposed point of diversion within a state water district? ☒ Yes. Water District # 120. ☐ No.

4. If already constructed and in use, are the proposed points of diversion equipped with Department-approved measuring devices? ☒ Yes. ☐ No.

5. If this application proposes to divert a surface water right from a ground water well, attach a technical analysis evaluating the hydraulic connection between the proposed ground water point of diversion and the source of water listed on the right to be changed. Label technical analysis as Attachment 4B-5.

6. If this application proposes changing the point of diversion for a ground water right in the Eastern Snake Plain Aquifer (ESPA), attach a technical analysis of the anticipated depletions to reaches of the Snake River that are hydraulically connected to the ESPA using the Department's current ground water model for the ESPA. The technical analysis must evaluate depletion impacts in a time-series format at transient and steady state time steps. To assist applicants in preparing the required technical analysis, the Department has developed a transfer tool interface for the ESPA model. The transfer tool and user instructions can be downloaded from the Department's website (idwr.idaho.gov). If the proposed and current points of diversion are in the same or adjacent model cells, no technical analysis is required, unless specifically requested by the Department. Label technical analysis as Attachment 4B-6.

C. Enlargement in Use

1. Identify any other water rights used at the current place of use, including the number of shares in a canal company or acres assessed by an irrigation district.

None

2. Identify any other water rights used at the proposed place of use, including the number of shares in a canal company or acres assessed by an irrigation district.

None

3. If this application proposes changing the place of use or nature of use for irrigation water rights, will the current place of use, for the portion of the right to be changed, continue to be irrigated?

☐ Yes. Identify the water right(s) to be used for the continued irrigation.

☒ No. The place of use for the portion to be changed will no longer be irrigated.

☐ N/A. The application does not propose to change the place of use for irrigation rights.

4. Unstacking Water Rights for Irrigation. If this application proposes to change the place of use for an irrigation water right that is combined with other irrigation rights at the current place of use but does not propose to change the place of use for all the stacked irrigation rights, attach evidence of the historical consumptive use occurring under all water rights at the current place of use. For irrigation rights, this should include at least five years of diversion data and/or crop data and estimates of evapotranspiration. Label the information as Attachment 4C-4. Evapotranspiration data may be available on the Department's website (<http://et-idwr.idaho.gov>)

5. If the application proposes to change the nature of use for a water right, attach evidence of the historical consumptive use occurring under the portion of the water right to be changed. For irrigation rights, this should include diversion data, crop data and estimates of evapotranspiration. Label the information as Attachment 4C-5. Evapotranspiration data may be available on the Department's website (<http://et-idwr.idaho.gov>)

6. If the application proposes to change the nature of use of a water right to municipal use for reasonably anticipated future needs, complete the form titled "Municipal Water Right Application Checklist" found on the Department's website (idwr.idaho.gov). Label the form as Attachment 4C-6.

7. To your knowledge, are any portions of the water rights proposed to be changed:

Yes No

☐

☒

currently leased to the Water Supply Bank?

If yes, complete the form titled "Application for Transfer of Water Right Attachment WSB" found on the Department's website (idwr.idaho.gov).

Label the Form as Attachment 4C-7.

☐

☒

currently used in a mitigation plan limiting the use of water under the right?

☐

☒

subject to an agreement not to divert (CREP)?

☐

☒

currently enrolled in a federal set-aside program (CRP)?

D. Local Public Interest

The department must consider whether the proposed changes are in the local public interest as defined in Section 42-202B(3), *Idaho Code*. Some of the local public interest factors that may be considered in conjunction with a transfer application are (1) Recreation, fish, and wildlife impacts, (2) Water quality or contamination concerns, (3) Local and state ordinances, regulations, or policies related to water use, (4) Goals, requirements and limits set forth in the State Water Plan. If you choose to provide information about local public interest factors, label the information as Attachment 4D.

E. Conservation of Water Resources

Describe the diversion works and water delivery system. This may include sizes and dimensions of pumps, pipelines, headgates, ditches, dams, impoundments and irrigation equipment.

Well and pump into mainlines for pivot systems.

PART 5 – FILING FEE AND SIGNATURE

A. Filing Fee. Filing fees for transfer applications are set forth in Section 42-221.O, *Idaho Code*. A table summarizing the filing fees for transfer applications is also found on the Department's website (idwr.idaho.gov). Any application proposing to change the nature of use for one or more rights requires an additional filing fee of \$250. Applications proposing to update the ownership records for water rights must also include the appropriate filing fee to update the ownership records. For any application relying on the filing fee set forth in Section 42-221.O.8, *Idaho Code*, attach a statement describing how the application qualifies under Section 42-221.O.8. Label documents as Attachment 5A.

B. Affidavit of Applicant or Representative:

I hereby assert that no one will be injured by the proposed changes and that the proposed changes do not constitute an enlargement in use of the original right(s). The information contained in this application is true to the best of my knowledge. I understand that any willful misrepresentations made in this application may result in rejection of the application or cancellation of an approval.

<u>Robert L. Harris</u>	Robert L. Harris, Attorney	May 7, 2026
Signature of Applicant or Representative*	Print Name and Title, if applicable	Date
Signature of Applicant or Representative*	Print Name and Title, if applicable	Date

*If water rights included in this application are owned by multiple people or entities, each owner must sign the application form.

FOR DEPARTMENT USE ONLY

Fee Paid: \$ 580.00 Receipt #: E051647 Date: 5-13-26 Received by: M. Pette
 Add'l Paid: \$ _____ Receipt #: _____ Date: _____ Received by: _____
**380.00 refund requested 5/27/26 - CH

Attachment No. 1A
Documentation Authorizing
Representative to Sign

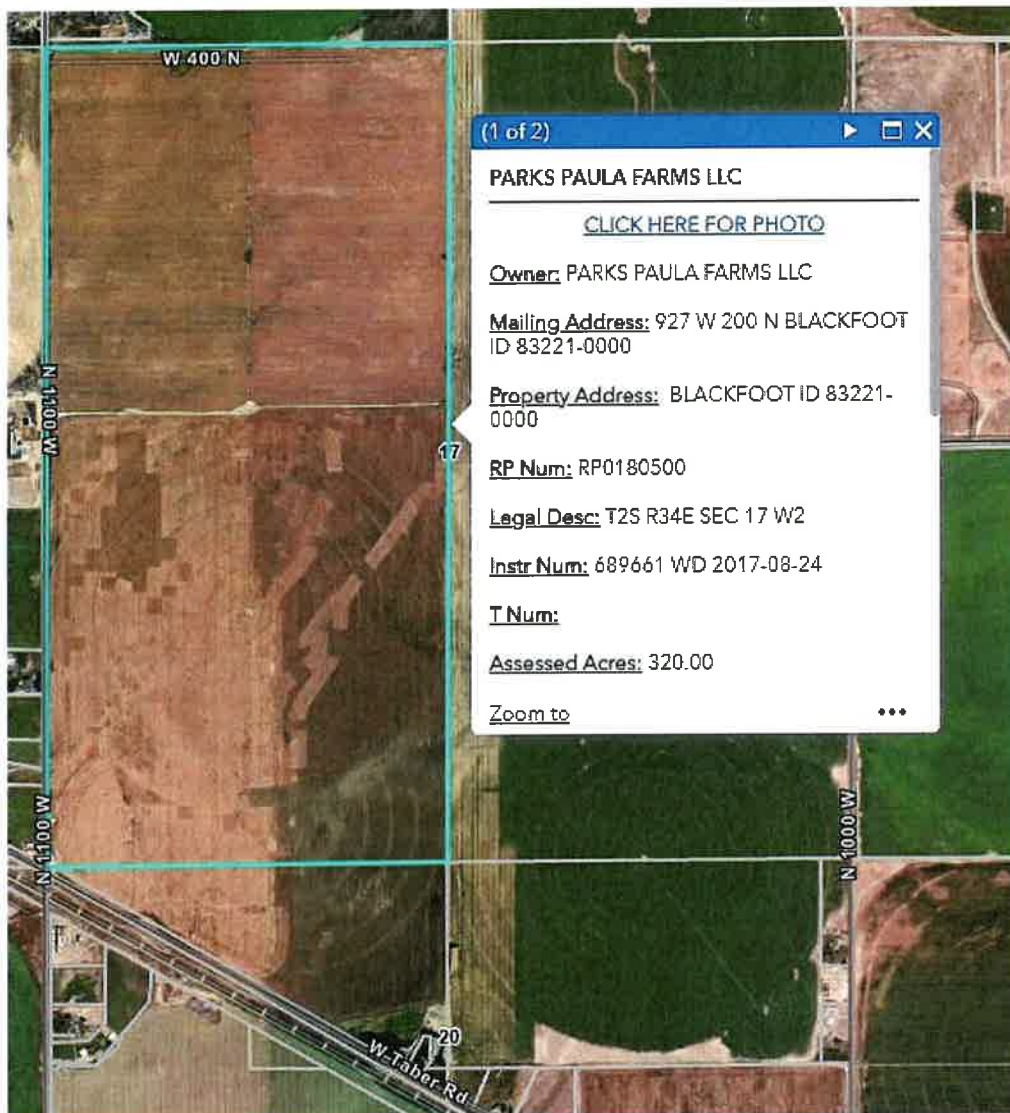
May 12, 2026

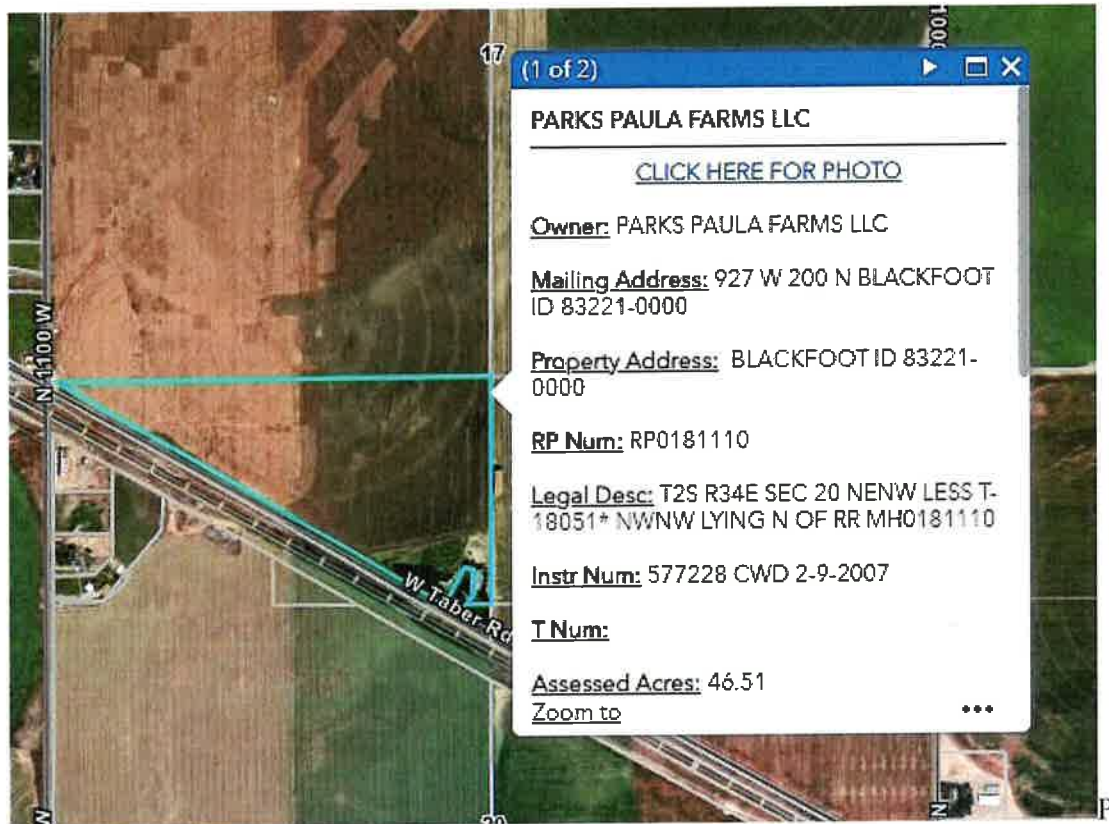
To: Idaho Department of Water Resources

From: Paula Parks, LLC (Paula Parks) and Alan G. Parks/Nicole L. Parks

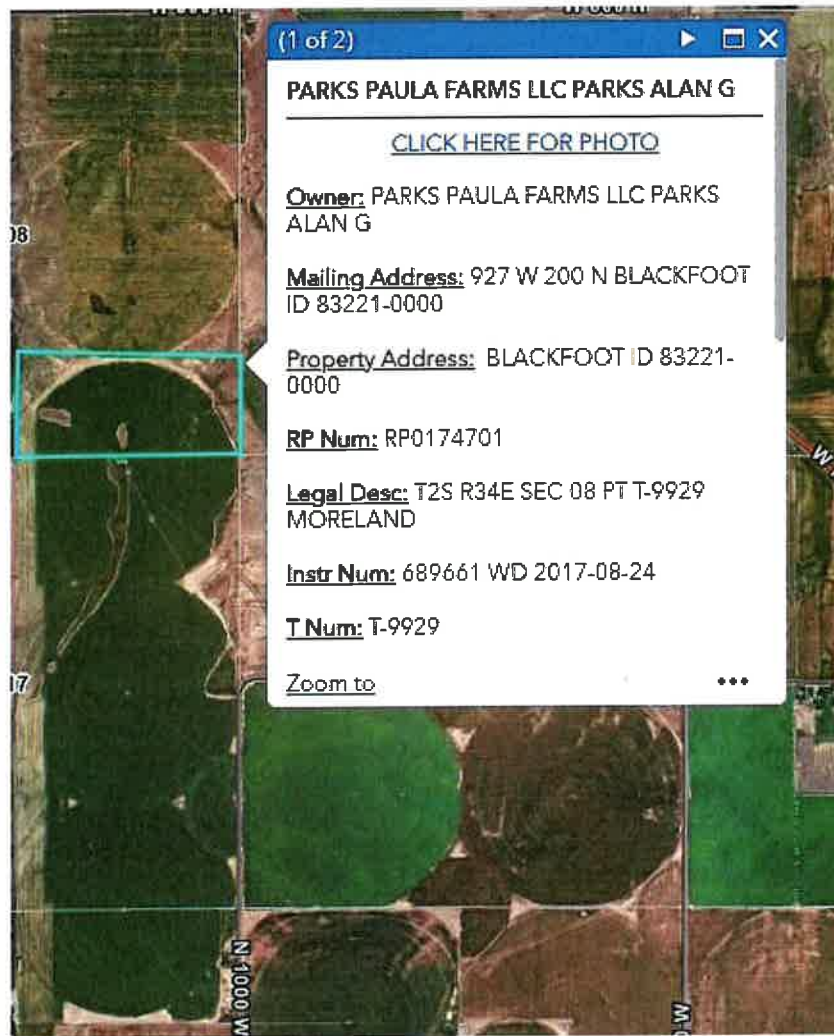
Subject: Applications for Transfer of Water Right Nos. 35-2206 & 35-2839, 35-4151B, 35-4263, 35-2694

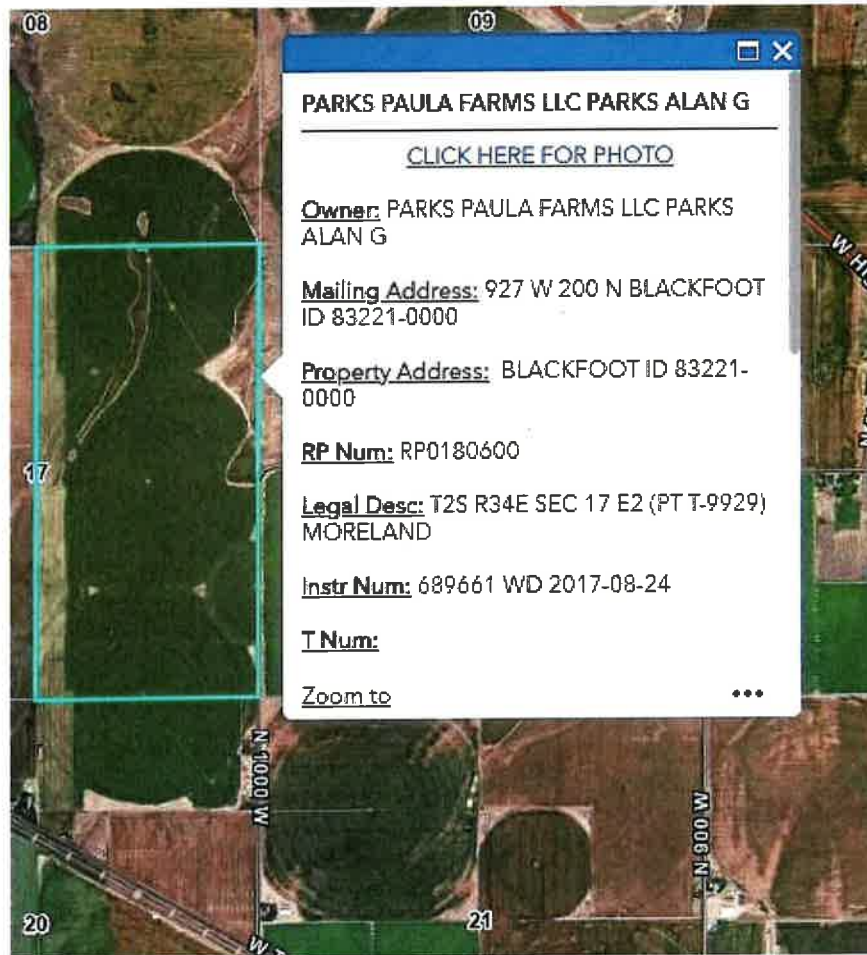
Paula Parks Farms, LLC is the owner of WRs 35-2206 and 35-2839. These water rights are associated with the follow properties:

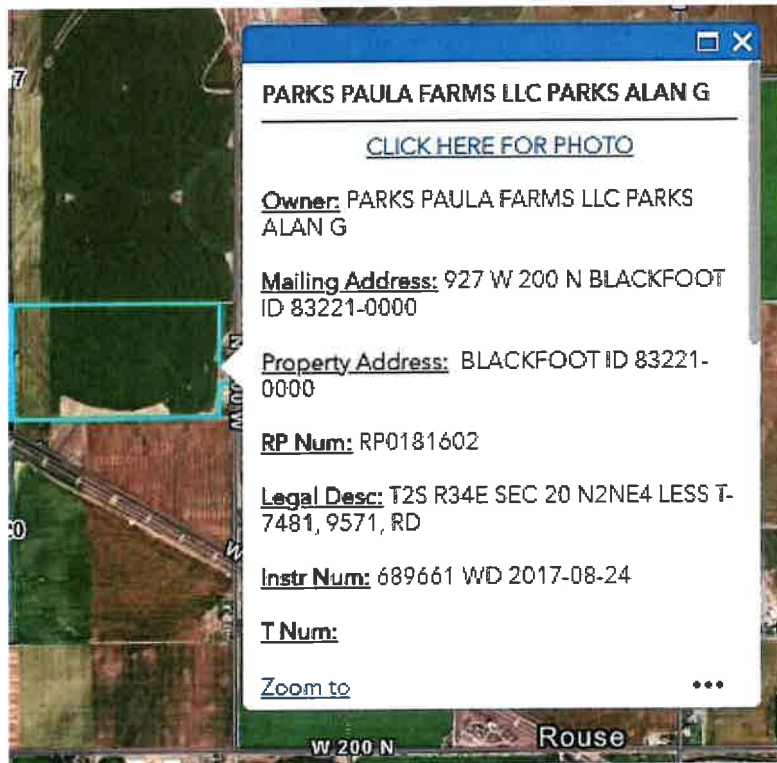




Paula Parks Farms, LLC and Alan G. Parks/Nicole L. Parks are the owners of WRs 35-4151B, 35-4263, 35-2694. These water rights are associated with the following properties:







Paula Parks Farms, LLC and Alan G. Parks/Nicole L. Parks have decided to shift their water rights around to cover previously unauthorized acres and to ensure that the water rights match the independent irrigation systems and associated center pivots/irrigated acres associated with each system. A map of the end result of these transfers is set forth here:

PARKS FARMS TRANSFER



Paula Parks Farms, LLC and Alan G. Parks/Nicole L. Parks hereby consent to any transfer or transfers filed by Robert L. Harris of Holden, Kidwell, Hahn & Crapo, P.L.L.C. for the above-described water right(s), with the intent that this single consent may be submitted as proof of authorization for any transfer(s) of the above-described water right(s). This authorization further provides our consent to the location of water rights on our properties that may not match title to the underlying properties. This consent shall be valid and may be submitted for any transfer of the above-described water right(s) up until December 31, 2026.

The parties acknowledge and understand that for each transfer that is approved, the above-described water right(s) will be amended, with the understanding that title to the water right(s) can only be transferred upon execution and recording of a deed for the water right(s).

I certify (or declare) under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct. Idaho Code § 9-1406; Idaho Rule of Civil Procedure 2.7.

Paula Parks Farms, LLC

Paula Parks
By: Paula Parks
Its: Manager

Date: 5/12/26

I certify (or declare) under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct. Idaho Code § 9-1406; Idaho Rule of Civil Procedure 2.7.

Alan G. Parks
Alan G. Parks

Date: 5/13/26

I certify (or declare) under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct. Idaho Code § 9-1406; Idaho Rule of Civil Procedure 2.7.

Nicole L. Parks
Nicole L. Parks

Date: 5/13/26

Transfer Consent—Page 7

Transfer Consent—Page 7

90470

Attachment No. 1D
Authority of Signer if Signing
on Behalf of Business Entity



0006569301

**STATE OF IDAHO***Office of the secretary of state, Phil McGrane***ANNUAL REPORT**

Idaho Secretary of State
PO Box 83720
Boise, ID 83720-0080
(208) 334-2301
Filing Fee: \$0.00

*For Office Use Only***-FILED-**

File #: 0006569301

Date Filed: 12/9/2025 4:40:59 PM

Entity Name and Mailing Address:

Entity Name: PAULA PARKS FARMS, LLC
The file number of this entity on the records of the Idaho Secretary of State is: 0000405328
Address: MICHAEL PARKS
927 W 200 N
BLACKFOOT, ID 83221-5263

Entity Details:

Entity Status: Active-Existing
This entity is organized under the laws of: IDAHO
If applicable, the old file number of this entity on the records of the Idaho Secretary of State was: W132634

The registered agent on record is:

Registered Agent: PAULA PARKS
Registered Agent
Physical Address
927 W 200 N
BLACKFOOT, ID 83221
Mailing Address

Limited Liability Company Managers and Members

Name	Title	Business Address
Paula Parks	Manager	927 WEST 200 NORTH BLACKFOOT, ID 83221

The annual report must be signed by an authorized signer of the entity.

Job Title: Michael Parks

Michael Parks

Sign Here

12/09/2025

Date

Attachment No. 2A

Current Water Rights

IDAHO DEPARTMENT OF WATER RESOURCES

WATER RIGHT REPORT

4/29/2026

IDAHO DEPARTMENT OF WATER RESOURCES

Water Right Report

WATER RIGHT NO. 35-4263

<u>Owner Type</u>	<u>Name and Address</u>
Current Owner	NICOLE L PARKS
Current Owner	PAULA G PARKS
	86 N 900 W
	BLACKFOOT, ID 83221-5350
	2086819404
Current Owner	ALAN G PARKS
Current Owner	RAYMOND PARKS
	927 W 200 N
	BLACKFOOT, ID 83221
	2086844816
Directors Report Owner	ROGER D WILLIAMS FAMILY LTD PARTNERSHIP
	HOLDEN KIDWELL HAHN & CRAPO
	PO BOX 50130
	IDAHO FALLS, ID 83405
	2085230620
Directors Report Owner	ROBERT L HARRIS
	PO BOX 50130
	IDAHO FALLS, ID 83402
	2085230620
Original Owner	THOMPSON FARMS PARTNERSHIP
	493 S 1200 W
	PINGREE, ID 83262
	2086844254
Security Interest	IDAHO AGCREDIT PCA
	PO BOX 985
	BLACKFOOT, ID 83221-0985
	8006868910

Priority Date: 03/18/1963

Basis: Decreed

90470

Status: Active

Source | Tributary
GROUND WATER |

Beneficial Use	From	To	Diversion Rate	Volume
IRRIGATION	4/01	10/31	2.43 CFS	912 AFA
Total Diversion			2.43 CFS	912 AFA

Location of Point(s) of Diversion:

GROUND WATER | SENESE | Sec. 17 | Township 02S | Range 34E | BINGHAM County

Place(s) of use:

Place of Use Legal Description: IRRIGATION BINGHAM County

Township	Range	Section	Lot	Tract	Acres	Lot	Tract	Acres	Lot	Tract	Acres	Lot	Tract	Acres
02S	34E	17		SWNE	40		SENE	32						
				NESE	38		NWSE	40		SWSE	40		SESE	38

Total Acres: 228

Conditions of Approval:

- C18 THIS PARTIAL DECREE IS SUBJECT TO SUCH GENERAL PROVISIONS NECESSARY FOR THE DEFINITION OF THE RIGHTS OR FOR THE EFFICIENT ADMINISTRATION OF THE WATER RIGHTS AS MAY BE ULTIMATELY DETERMINED BY THE COURT AT A POINT IN TIME NO LATER THAN THE ENTRY OF A FINAL UNIFIED DECREE. SECTION 42-1412(6), IDAHO CODE.

Dates:

Licensed Date:

Decreed Date: 02/25/2002

Enlargement Use Priority Date:

Enlargement Statute Priority Date:

Water Supply Bank Enrollment Date Accepted:

Water Supply Bank Enrollment Date Removed:

Application Received Date:

Protest Deadline Date:

Number of Protests: 0

Other Information:

State or Federal: S

Owner Name Connector: AND/OR

Water District Number: 120

Generic Max Rate per Acre:

90470

Generic Max Volume per Acre:

Civil Case Number:

Old Case Number:

Decree Plaintiff:

Decree Defendant:

Swan Falls Trust or Nontrust:

Swan Falls Dismissed:

DLE Act Number:

Cary Act Number:

Mitigation Plan: False

Attachment No. 2B
Map of Current System

PLACE OF USE LEGAL DESCRIPTION (Red POU)

TWP	RGE	SEC	NE 1/4				NW 1/4				SW 1/4				SE 1/4				TOTALS
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	
02S	34E	8															29	29	58
02S	34E	17	34	34	6.1														74.1
																			0
																			0
																			0
TOTAL IRRIGATED ACRES																			132.1

PLACE OF USE LEGAL DESCRIPTION (White POU)

TWP	RGE	SEC	NE 1/4				NW 1/4				SW 1/4				SE 1/4				TOTALS
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	
02S	34E	17			33	30									38	39	6.4	7	153.4
																			0
																			0
TOTAL IRRIGATED ACRES																			153.4

PLACE OF USE LEGAL DESCRIPTION (Green POU)

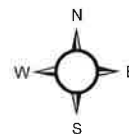
TWP	RGE	SEC	NE 1/4				NW 1/4				SW 1/4				SE 1/4				TOTALS
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	
02S	34E	17															32	31	63
02S	34E	20	32	35															67
																			0
																			0
TOTAL IRRIGATED ACRES																			130

PLACE OF USE LEGAL DESCRIPTION (Yellow POU)

TWP	RGE	SEC	NE 1/4				NW 1/4				SW 1/4				SE 1/4				TOTALS
			NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	NE	NW	SW	SE	
02S	34E	17					40	39	39	39	39	38	37	39.5					310.5
02S	34E	20					20	10											30
																			0
																			0
TOTAL IRRIGATED ACRES																			340.5

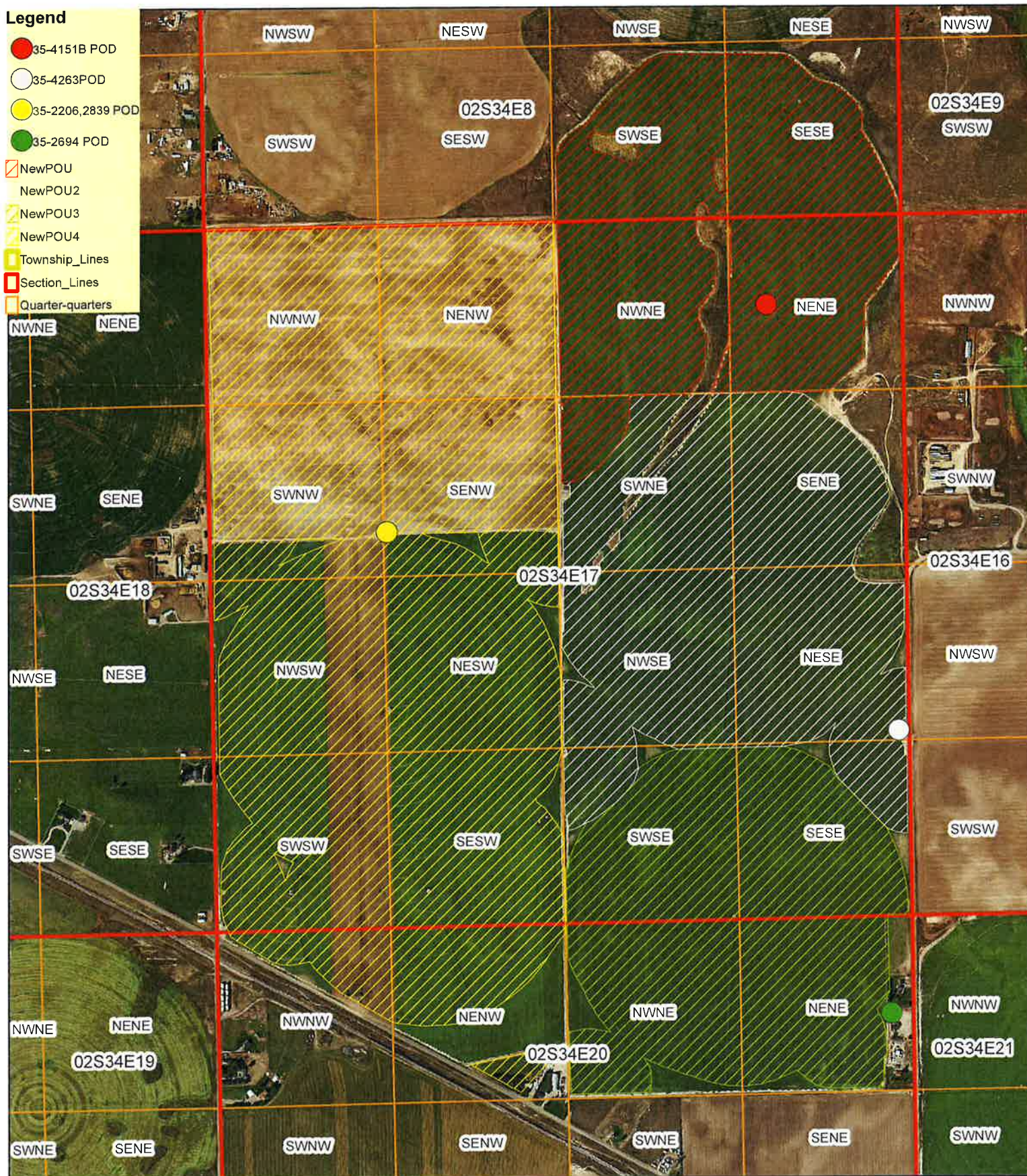
TOTAL ACRES	756
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PARKS FARMS TRANSFER



Legend

- 35-4151B POD
- 35-4263POD
- 35-2206,2839 POD
- 35-2694 POD
- NewPOU
- NewPOU2
- NewPOU3
- NewPOU4
- Township_Lines
- Section_Lines
- Quarter-quarters



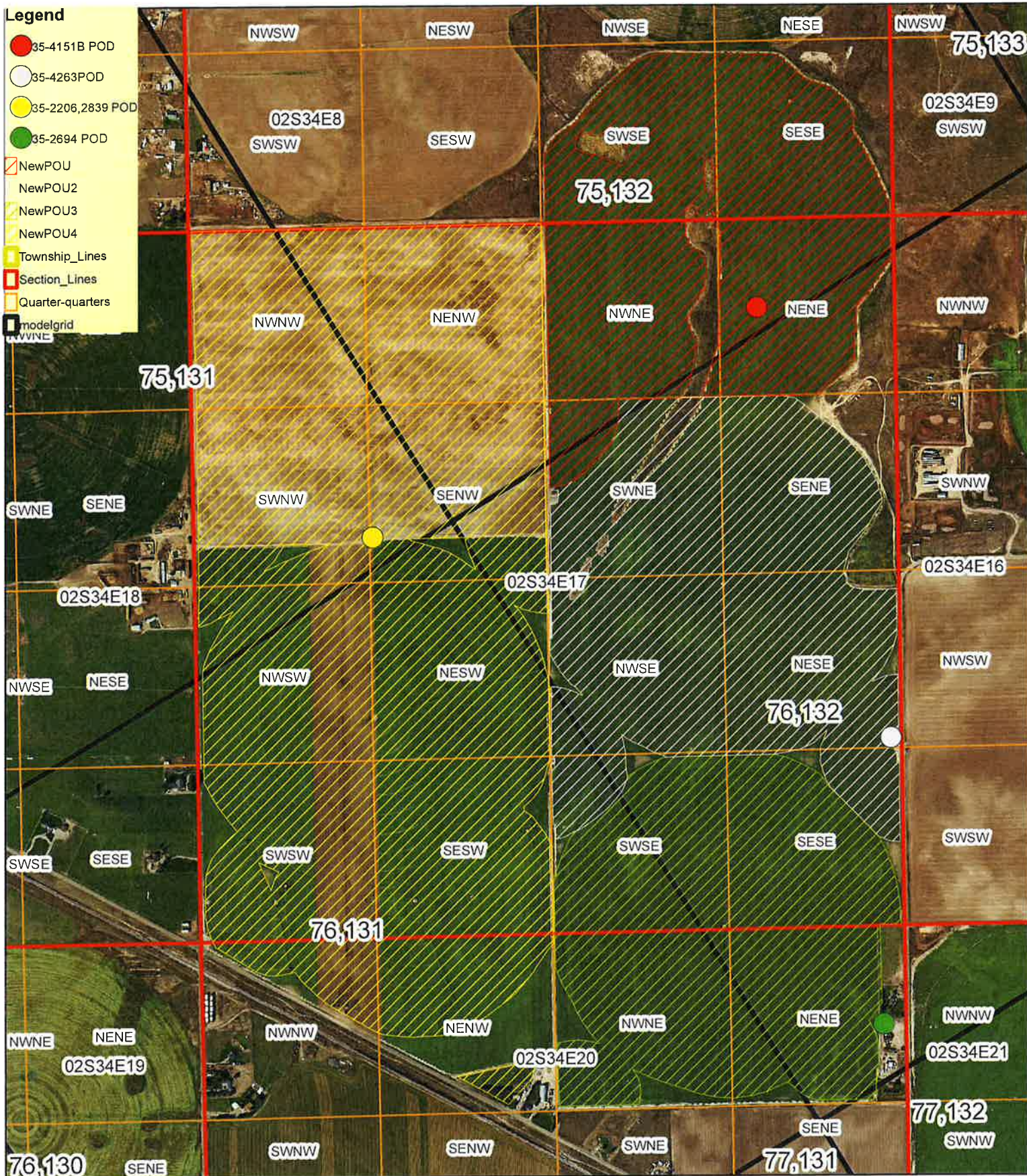
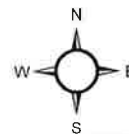
Prepared by:
Robert L. Harris
2019 Photo

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0 0.225 0.45 0.9 Miles

Attachment No. 2C
Current Location of Irrigated
Acres

PARKS FARMS TRANSFER



GIS shapefiles will be emailed upon request to the Applicant's representative.



Holden Kidwell
Hahn & Crapo P.L.L.C.
L A W O F F I C E S

Established in 1896

1000 Riverwalk Drive, Suite 200
PO Box 50130
Idaho Falls, Idaho 83405
Tel: (208) 523-0620
Fax: (208) 523-9518
www.holdenlegal.com
rharris@holdenlegal.com

May 13, 2026

RECEIVED

MAY 13 2026

Idaho Department of Water Resources
900 N Skyline Dr., Suite A
Idaho Falls, ID 83402

DEPT. OF WATER RESOURCES
EASTERN REGION

Re: *Three Applications for Transfer Submitted on Behalf of Paula Parks Farms, LLC,
and Alan G. Parks and Nicole L. Parks.*

Dear Reviewing Agent:

Enclosed for processing are three transfer applications necessary to conform the existing water rights owned by the applicants to match isolated pivot irrigation systems located on their adjacent farm ground parcels. For ease of reference, we have color coded each isolated irrigation system with red, yellow, white, and green colors.

The first transfer application is associated with the red place of use. It proposed to move acres from the yellow place of use and the white place of use to cover irrigated acres that were previously subject to a notice of violation proceeding. The result of this transfer will be a 2.47 cfs and 528.4 acre feet of water rights that will cover the area depicted in red single hatching. We have included an individual check in the amount of \$660.00 for this transfer.

The second transfer is associated with the green place of use. It combines an existing water right with a portion of the white water right, the result of which will be 2.05 cfs and 520 acre feet for the irrigation of 130 acres depicted in green single hatching on the enclosed maps. We have likewise included a second check in the amount of \$660.00 for this transfer application.

The third and final transfer application is associated with the white place of use. No water rights will join this existing water right. Rather, we felt that this transfer was necessary to clearly depict the remaining 153.4 acres that will be irrigated under the water right covering the white single hatch place of use (water right no. 35-4263). The result will be a 1.64 cfs and 613.6 acre foot water right for the irrigation of 153.4 acres. We have included a check in the amount of \$580.00 for this transfer application.

Finally, we did not feel it was necessary to file a transfer application for the yellow place of use because the only change to these particular water rights is a reduction in the place of use from 355 acres down to 340.5 acres. We do note that in our acreage calculations per quarter quarter, they differ slightly from what is listed in the current water right report, which we have

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seen before with shape files generated early in the Snake River Basin Adjudication. Accordingly, we ask that the place of use be described for the water rights associated with the yellow single hatched area as summarized on a summary spreadsheet included with all three of the other transfers.

Please also note that the color of the single hatched place of use matches the color of the dot indicating the authorized point of diversion for each individual irrigation system.

We appreciate your attention to this matter. Because of the adjoining nature of these two farms, we do not believe it would be necessary to advertise these transfers. Nevertheless, should the Department decide to advertise these transfers, or at least some of them, please let me know.

Finally, we previously submitted a Notice of Change in Water Right Ownership for the current water rights to match the ownership of the respective parcels.

As noted in the transfer applications, I can email you the GIS shapefiles upon request.

Best Regards,



Robert L. Harris
HOLDEN, KIDWELL, HAHN & CRAPO, P.L.L.C.

Enclosures

\\Law\data\WPDATA\RLH\15003-005 2026 Matters\Ownership Change\2026.05.13 Letter to IDWR.docx