



## EXHIBIT "A"

### GROUNDS OF PROTEST

1. Approval of the subject applications will adversely impact existing rights, including but not limited to, rights of residents of Lassen and Modoc Counties.
2. Approval of the subject applications, particularly when considered together with Applications Nos 63992-99 and 64000-09 will result in the drying up of springs ,seeps and areas that are presently sub-irrigated.
3. Approval of the subject applications, particularly when considered together with Applications Nos. 63992-63999 and 64000-64009, will result in the dewatering of the subject basins such that the economic viability of existing operations will be severely jeopardized.
4. On information and belief approval of the subject applications, particularly when considered together with Applications Nos. 63992-63999 and 64000- 64009 will result in the drying up of domestic and stock water wells with no alternative source of supply.
5. Approval of the subject applications, particularly when considered together with Applications Nos. 63992-63999 and 64000-64009, will dewater the subject basins resulting in dust and other environmental hazards.
6. The subject applications should be denied on the basis that there is no unappropriated water in the proposed source.
7. The subject applications should be denied on the basis that the applicant, through its past conduct in seeking to appropriate the same and similar water under Applications Nos. 50191-50194, 5019950236 and 40241, has demonstrated the subject applications, particularly when considered with Applications Nos. 63992-63999 and 64000-64009, have inappropriately been filed to preclude the legitimate use of the limited resource by others.
8. The subject applications should be denied "on the grounds that it would be detrimental to the public interest to grant permits for a project the applicant no longer considers a viable source for municipal supply and for which the applicant has no definite plans formulate pursuant to which the water would be put to beneficial use."
9. The subject applications should be summarily denied without further process on the grounds set forth herein above in the preceding paragraph and in the January 26, 1998 Ruling of the State Engineer No. 4599.