IN THE OFFICE OF THE STATE ENGINEER OF THE STATE OF NEVADA

IN THE MATTER OF APPLICATION NUMBER 85880

FILED BY Park Ranch Holdings, LLC

ON January 22, 20 16

FILED
PROTEST
MAR 10 2016
STATE ENGINEER'S OFFICE

RECEIVED
2016 MAR 10 AM 11:24
STATE ENGINEER'S OFFICE

Comes now Adrian Lynn Lyells
Printed or typed name of protestant

whose post office address is 476 Rockwood Dr, Southington, CT 06489
Street No. or PO Box, City, State and ZIP Code

whose occupation is Accountant and protests the granting

of Application Number 85880, filed on January 22, 20 16

by Park Ranch Holdings, LLC for the

waters of East Fork of the Carson River situated in Douglas
an underground source or name of stream, lake, spring or other source

County, State of Nevada, for the following reasons and on the following grounds, to wit:

1. Application nos. 85878, 85879, 85880, 85881 jointly seek to change the Carson River Diversion for approximately 517 acres of irrigation. The Williams Slough does not have the capacity to handle such a large additional amount of water.
2. The Applicant's priorities under Claims 428 and 430 of the Carson River Decree have an 1858 priority. The earliest priority on the Williams Slough currently is 1859. The effect of the proposed changes is to put over 500 acres of new lands to be irrigated from the Williams Slough with the same or earlier priority upstream of the Protestant's decreed lands. This will adversely impact existing rights, and be detrimental to numerous downstream decreed owners. The Williams Slough not having any further capacity means that other water rights holders on the Williams Slough would suffer from a severely diminished, if not entirely eliminated, water supply at their takeouts, except possibly during the highest river flows.
3. The Applicant has no right to divert water from the Williams Slough under the Carson River Decree, and permanent changes to the Decree should not be considered without a thorough and careful review of all possible ramifications. Applicant should focus on getting its decreed diversions corrected to match the manner by which the Applicant has been taking its water for the last 40+ years.
4. Applicant proposes major changes to the water distribution without any discussion, explanation or notice to the affected Williams Slough owners.
5. The applicant has not demonstrated any legal right to utilize the Williams Slough.
6. Although the Williams Slough crosses the Applicant's property, the Applicant has not historically participated in the maintenance of the ditch or the diversion in the Carson River. Last year, Applicant provided some rock for maintenance of the diversion dam in the Carson River to help protect Applicant's ability to receive water under Temporary Permits which were issued without input from the Williams Slough decreed water rights holders.

THEREFORE the Protestant requests that the application be DENIED
Denied, issued subject to prior rights, etc., as the case may be

and that an order be entered for such relief as the State Engineer deems just and proper.

Signed [signature]
Agent or protestant

Adrian Lyells
Printed or typed name, if agent

Address 476 Rockwood Dr
Street No. or PO Box

Southington, CT 06489
City, State and ZIP Code

860 329-0360
Phone Number

RLyells@yahoo.com
E-mail

State of ~~Nevada~~ CT
County of Hartford

Subscribed and sworn to before me on 3-7-16.

by Adrian L. Lyells

JAIMIE L. POLANSKI
NOTARY PUBLIC
MY COMMISSION EXPIRES SEP. 30, 2018

Signature of Notary Public Required

Notary Stamp or Seal Required

+ $30 FILING FEE MUST ACCOMPANY PROTEST. PROTEST MUST BE FILED IN DUPLICATE.

ALL COPIES MUST CONTAIN ORIGINAL SIGNATURE.