

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

STATE OF NEW MEXICO
State Engineer, *ex rel.*

Plaintiff,

v.

R. LEE AAMODT,
et al.,
Defendants.

and
UNITED STATES OF AMERICA,
PUEBLO DE NAMBE,
PUEBLO DE POJOAQUE,
PUEBLO DE SAN ILDEFONSO,
and PUEBLO DE TESUQUE,
Plaintiffs-in-Intervention

No. 66cv06639 WJ/WPL

**EIGHTH MOTION TO JOIN PRE-MORATORIUM CLAIMANTS AS
ADDITIONAL PARTIES DEFENDANT**

The State of New Mexico, *ex rel.* State Engineer (“State”) hereby respectfully requests the Court to join as additional parties defendant the person or persons or entities named below and order them to answer the State’s Complaint in this action as required in any civil action in the United States District Court or suffer default judgment against the party. In support of this motion, the State asserts:

1. The persons or entities listed below are diverting and using or may claim a right to divert and use a domestic well and the underground waters within the Nambé, Pojoaque, and Tesuque stream system in New Mexico:

<u>Name</u>	<u>Address</u>	<u>Subfile(s)</u>
CANDEE, PAULINE QUINTANA	349B COUNTY ROAD 84 SANTA FE, NM 87506	AAM-RG-16874
COE, JEROME	6316 HASKELL STREET HOUSTON, TX 77007	AAM-RG-39112
DURAN FAMILY TRUST, GILBERT R. & PAULINE O.	7 CAMINO BAJO SANTA FE, NM 87506	AAM-RG-26747
GOLDSTEIN, SUSAN B.	1916 LAKES EDGE DRIVE LEXINGTON, KY 40502	AAM-RG-38088
HABBERSETT, ROBERT C.	103 VISTA REDONDA SANTA FE, NM 87506	AAM-RG-33483
KAH, MARIANNE	6316 HASKELL STREET HOUSTON, TX 77007	AAM-RG-39112
PALMER, KATHARINE A.	103 VISTA REDONDA SANTA FE, NM 87506	AAM-RG-33483
ROWLISON, ANNE M.	RT. 1 BOX 101C SANTA FE, NM 87506	AAM-RG-13338
SALAZAR, LINDA M.	04-A MI RANCHITO SANTA FE, NM 87506	AAM-RG-28695
TRUJILLO, YOLANDA J.	P.O.BOX 658 LOS ALAMOS, NM 87544	AAM-RG-33016

2. The water uses, or claims to the right to use water, of these persons or entities are subject to the laws of the State of New Mexico and the United States. This Court has exclusive jurisdiction to adjudicate all claims to the right to divert, store, or use public waters of the Nambé, Pojoaque, and Tesuque stream system in New Mexico;

3. The persons or entities listed above may be diverting and using water associated with the subfile number listed, or may otherwise be using or diverting the underground waters within the Nambé, Pojoaque, and Tesuque stream system;

4. For the benefit of other parties, and by way of explanation, the State asserts that motions to add additional defendants, dismiss defendants, correct defendants' names, and take other corrective action, are parts of an on-going process made necessary by court process and procedures, the hydrographic survey, defendants' responses and other kinds of new information received during the course of this adjudication. The State advances such motions primarily for the purpose of ensuring that the Court's records indicate as accurately as possible the persons or entities that are parties to this case.

Electronically Filed

/s/ Edward C. Bagley
EDWARD C. BAGLEY

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Attorney for the State Of New Mexico, *ex rel.*
State Engineer

CERTIFICATE OF SERVICE

I hereby certify that on the 19 of December, 2014, I filed the foregoing electronically through the CM/ECF system which caused the parties on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail, and served the following non-CM/ECF participants attached as Exhibit A via first class mail, postage prepaid.

/s/ Edward C. Bagley
EDWARD C. BAGLEY

Exhibit A

PAULINE QUINTANA CANDEE	349B COUNTY ROAD 84, SANTA FE, NM 87506
JEROME COE	6316 HASKELL STREET, HOUSTON, TX 77007
GILBERT R. & PAULINE O. DURAN FAMILY TRUST	7 CAMINO BAJO, SANTA FE, NM 87506
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YOLANDA J. TRUJILLO	P.O.BOX 658, LOS ALAMOS, NM 87544