

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

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

Plaintiff,

v.

No. 66cv06639 WJ/WPL

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

TWENTIETH 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>
ARCHULETA, ELVERA	28 CAMINO DEL OJITO SANTA FE, NM 87506	AAM-RG-16812
ARCHULETA, JOHN P.	28 CAMINO DEL OJITO SANTA FE, NM 87506	AAM-RG-16812
BENT, DEVIN	193 COUNTY ROAD 113 SANTA FE, NM 87506	AAM-RG-25560
BENT, JUDITH	193 COUNTY ROAD 113 SANTA FE, NM 87506	AAM-RG-25560
DOUGHERTY, WILLIAM DAVID	P.O. BOX 1716 SANTA FE, NM 87506	AAM-RG-39174
DRAKE, NANCY	45 TANO ALTO SANTA FE, NM 87506	AAM-RG-28468
FEULNER, BRENT	45 TANO ALTO SANTA FE, NM 87506	AAM-RG-28468
LACY REV. TRUST, KEITH A. AND LESLEY E.	11 BUNDY ROAD SANTA FE, NM 87506	AAM-RG-32377
LUSK, DOROTHY LEE	P.O. BOX 537 TESUQUE, NM 87574	AAM-RG-34539
MARES, BRENDA YVONNE	1043 CALLE CARMELITA SANTA FE, NM 87501	AAM-RG-34114
MONTOYA REV. TRUST, JOSE L. AND VIRGINIA A.	288 STATE ROAD 503 SANTA FE, NM 87506	AAM-RG-07988
RAFFANTI, MICHAEL PETER	4749 CREEKHAVEN ROAD AUBURN, CA 95602	AAM-RG-09990
RIOS, EDDIE A.	22 A ANA MARIA LANE SANTA FE, NM 87506	AAM-RG-21464
RIOS, QUELLA	22 A ANA MARIA LANE SANTA FE, NM 87506	AAM-RG-21464
SALAZAR-LANGLEY, CRISTINA	36 SANDY WAY SANTA FE, NM 87506	AAM-RG-26003
SCHINDLER, DONNA LYNN	4749 CREEKHAVEN ROAD AUBURN, CA 95602	AAM-RG-09990
TRUJILLO, FRED	38 COUNTY ROAD 117 N SANTA FE, NM 87506	AAM-RG-32074
TRUJILLO, VIRGINIA	38 COUNTY ROAD 117 N SANTA FE, NM 87506	AAM-RG-32074
WONG, YUDI	1043 CALLE CARMELITA SANTA FE, NM 87501	AAM-RG-34114

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 18 of DEC 2015 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

ELVERA ARCHULETA	28 CAMINO DEL OJITO, SANTA FE, NM 87506
JOHN P. ARCHULETA	28 CAMINO DEL OJITO, SANTA FE, NM 87506
DEVIN BENT	193 COUNTY ROAD 113, SANTA FE, NM 87506
JUDITH BENT	193 COUNTY ROAD 113, SANTA FE, NM 87506
WILLIAM DAVID DOUGHERTY	P.O. BOX 1716, SANTA FE, NM 87506
NANCY DRAKE	45 TANO ALTO, SANTA FE, NM 87506
BRENT FEULNER	45 TANO ALTO, SANTA FE, NM 87506
KEITH A. AND LESLEY E. LACY REV. TRUST	11 BUNDY ROAD, SANTA FE, NM 87506
DOROTHY LEE LUSK	P.O. BOX 537, TESUQUE, NM 87574
BRENDA YVONNE MARES	1043 CALLE CARMELITA, SANTA FE, NM 87501
JOSE L. AND VIRGINIA A. MONTROYA REV. TRUST	288 STATE ROAD 503, SANTA FE, NM 87506
MICHAEL PETER RAFFANTI	4749 CREEKHAVEN ROAD, AUBURN, CA 95602
EDDIE A. RIOS	22 A ANA MARIA LANE, SANTA FE, NM 87506
QUELLA RIOS	22 A ANA MARIA LANE, SANTA FE, NM 87506
CRISTINA SALAZAR- LANGLEY	36 SANDY WAY, SANTA FE, NM 87506
DONNA LYNN SCHINDLER	4749 CREEKHAVEN ROAD, AUBURN, CA 95602
FRED TRUJILLO	38 COUNTY ROAD 117 N, SANTA FE, NM 87506
VIRGINIA TRUJILLO	38 COUNTY ROAD 117 N, SANTA FE, NM 87506
YUDI WONG	1043 CALLE CARMELITA, SANTA FE, NM 87501