

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

FILED *JR*  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

2015 FEB 11 PM 1:18

CLERK-SANTA FE

STATE OF NEW MEXICO, ex rel. STATE  
ENGINEER,

Plaintiff,

v.

R. LEE AAMODT, et al.,

Defendants,

And

UNITED STATES OF AMERICA,  
PUEBLO DE NAMBÉ,  
PUEBLO DE POJOAQUE,  
PUEBLO DE SAN ILDEFONSO, and  
PUEBLO DE TESUQUE,

Plaintiffs-in-Intervention.

No. 66cv6639 MV/WPL

**PRE-BASIN WELL OWNER RESPONSE TO NEW MEXICO STATE ENGINEER  
MOTION FOR ORDER TO SHOW CAUSE**

*Lucy S. Roybal*

*Ben A. Roybal*, Pro Se, Pre-Basin Well Owner herein for (his/her/their) response  
(Print Well Owner Name)

to the State Engineer's Motion for Order to Show Cause why Pre-basin should not be wholesale reduced to 0.7 acre feet, and for their reasons state.

1. The State Engineer's attorneys acting with the authority of the Attorney General have previously promised that if a person registered their pre-basin well that they would be under no threat of having their permitted amount of water reduced in the future. This Motion is in direct contradiction of those promises.
2. The State Engineer has completely failed to identify and provide information as to which

wells this would apply to, making it nearly impossible to determine whether or not all affected persons are even aware of this new deception by the State Engineer's attorneys or whether or not the Attorney General supports the use of his authority in this manner.

3. Prior to granting the Motion it respectfully requested that the Court hold a public hearing on this matter and allow testimony of affected individuals.

Respectfully submitted,

*Lucy D. Raybal*  
*Bernice Raybal*  
\_\_\_\_\_  
Signature of Pre-Basin Well Owner

*21 Bouquet Lane*  
\_\_\_\_\_  
Street Address

*Santa Fe, N.M. 87506*  
\_\_\_\_\_  
City, State, and Postal Zip Code