

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

**FIFTEENTH 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>
ARROWSMITH, JANET BIXBY	185 EAGLE CREEK RUIDOSO, NM 88345	AAM-RG-04516
FRONTIERE, DOMINIC	P.O. BOX 280 TESUQUE, NM 87574	AAM-RG-39389
FRONTIERE, DOMINIC	P.O. BOX 280 TESUQUE, NM 87574	AAM-RG-39397
FRONTIERE, ROBIN B.	P.O. BOX 280 TESUQUE, NM 87574	AAM-RG-39389
FRONTIERE, ROBIN B.	P.O. BOX 280 TESUQUE, NM 87574	AAM-RG-39397
GARCIA, LUCY L.	13A EL PUEBLITO ROAD SANTA FE, NM 87506	AAM-RG-08777
GOMEZ, FILADELPIO E.	2283 CALLE CUESTA SANTA FE, NM 87505	AAM-RG-25937
HERRERA, BERLINA M.	08-B PASEO DE LA JOYA SANTA FE, NM 87506	AAM-RG-19472
HERRERA, CONRAD	6A CALLE MATILDE SANTA FE, NM 87506	AAM-RG-15753
HERRERA, ERNESTINE	6A CALLE MATILDE SANTA FE, NM 87506	AAM-RG-15753
LOPEZ, KIMBERLY	44 B SUNLIGHT VIEW SANTA FE, NM 87506-0218	AAM-RG-26533
NOLEN, DR. LARRY L.	112-114 COUNTY RD. 84 SANTA FE, NM 87506	AAM-RG-36903
NOLEN, MICHELLE M.	112-114 COUNTY RD. 84 SANTA FE, NM 87506	AAM-RG-36903
SAMUELSON, TIFFANY MARY	515 N FLAGLER DR SUITE 1700 WEST PALM BEACH, FL 33401	AAM-RG-23684
SMITH, KRISTINE M.	3 LOWLANDS LANE SANTA FE, NM 87506-7106	AAM-RG-24552
SMITH, MICHAEL A.	3 LOWLANDS LANE SANTA FE, NM 87506-7106	AAM-RG-24552
STEPHENSON, DONNAN	P.O. BOX 609 TRUST DEPT. SANTA FE, NM 87501	AAM-RG-00350
STEPHENSON, DONNAN	P.O. BOX 609 TRUST DEPT. SANTA FE, NM 87501	AAM-RG-20066
THOMAS, CYNTHIA A.	6029 FOREST HIGHLANDS DRIVE FT. WORTH, TX 76132	AAM-RG-27695
THOMAS, DAN A.	6029 FOREST HIGHLANDS DRIVE FT. WORTH, TX 76132	AAM-RG-27695
VALDEZ, ADEMIA	199 STATE ROAD 503 SANTA FE, NM 87506	AAM-RG-32689

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 3 of August 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**

JANET BIXBY ARROWSMITH	185 EAGLE CREEK, RUIDOSO, NM 88345
DOMINIC FRONTIERE	P.O. BOX 280, TESUQUE, NM 87574
ROBIN B. FRONTIERE	P.O. BOX 280, TESUQUE, NM 87574
LUCY L. GARCIA	13A EL PUEBLITO ROAD, SANTA FE, NM 87506
FILADELPIO E. GOMEZ	2283 CALLE CUESTA, SANTA FE, NM 87505
BERLINA M. HERRERA	08-B PASEO DE LA JOYA, SANTA FE, NM 87506
CONRAD HERRERA	6A CALLE MATILDE, SANTA FE, NM 87506
ERNESTINE HERRERA	6A CALLE MATILDE, SANTA FE, NM 87506
KIMBERLY LOPEZ	44 B SUNLIGHT VIEW, SANTA FE, NM 87506-0218
DR. LARRY L. NOLEN	112-114 COUNTY RD. 84, SANTA FE, NM 87506
MICHELLE M. NOLEN	112-114 COUNTY RD. 84, SANTA FE, NM 87506
TIFFANY MARY SAMUELSON	ED HOLT, 515 N FLAGLER DR SUITE 1700, WEST PALM BEACH, FL 33401
KRISTINE M. SMITH	3 LOWLANDS LANE, SANTA FE, NM 87506-7106
MICHAEL A. SMITH	3 LOWLANDS LANE, SANTA FE, NM 87506-7106
DONNAN STEPHENSON TRUSTEE	1ST NATL BANK OF SANTA FE, P.O. BOX 609 TRUST DEPT., SANTA FE, NM 87501
CYNTHIA A. THOMAS	6029 FOREST HIGHLANDS DRIVE, FT. WORTH, TX 76132
DAN A. THOMAS	6029 FOREST HIGHLANDS DRIVE, FT. WORTH, TX 76132
ADEMIA VALDEZ	199 STATE ROAD 503, SANTA FE, NM 87506