

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

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

2016 APR -6 AM 10:42
CLERK-SANTA FE

STATE OF NEW MEXICO, ex rel. STATE)	
ENGINEER,)	
)	
Plaintiff,)	
v.)	
)	
R. LEE AAMODT, et al.,)	
)	
Defendants.)	No. 66cv6639
and)	
)	
UNITED STATE OF AMERICA,)	
PUEBLO OF NAMBE,)	
PUEBLO OF POJOAQUE,)	
PUEBLO OF SAN ILDEFONSO, and)	
PUEBLO DE TESUQUE,)	
)	
Plaintiffs-in-Intervention.)	

**MOTION TO CHANGE DOMESTIC WELL ELECTION
OF SETTLEMENT AGREEMENT**

The undersigned, respectfully request to change their DOMESTIC WELL election associated with the Aamodt Settlement Agreement dated April 19, 2012 ("Agreement").

Name(s): Douglas J. Hefele and Jill Hefele, (hereafter: Douglas and Jill)

Address: 9 Las Joyas Lane, Santa Fe, NM 87506

Telephone Number: (505) 455-3874

Email: hefele@q.com

OSE File No., Court Subfile No: SD 01647 56A, 8.28

Well number(s): RG 47967

Physical address of well(s): 9 Las Joyas Lane, Santa Fe, NM 87506

BACKGROUND

Douglas and Jill are currently settlement parties to the Agreement. They signed the Agreement on 2/12/2015 and filed the signed Agreement with the US District Court on 2/13/2015. When they entered into the agreement at that time, Douglas and Jill elected to: *connect to the County Water Utility pursuant to Sections 3.1.7.2.1 and 3.1.7.4.1.*

MOTION

Douglas and Jill would like to continue to be settlement parties to the Agreement; however, they would like to change their Domestic Well Election to: *keep their well and limit use pursuant to Sections 3.1.7.2.2 and 3.1.7.4.2 of the Agreement.*

REASON

The reason for the change to their Domestic Well Election is largely due to the uncertainty associated with the reliability, water-quality, water-quantity, and cost associated with the yet-to-be constructed County Water Utility.

Douglas J. Hefele /  4/4/2016
Printed Name / Signature of Settlement Party Date

Jill Hefele /  4/4/2016
Printed Name / Signature of Settlement Party Date