

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

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

2016 AUG 31 PM 1:21

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 his DOMESTIC WELL elections associated with the Aamodt Settlement Agreement dated April 19, 2012 (“Agreement”).

Name(s): John P. Bradley

Address: 3 Las Joyas Lane, Santa Fe, NM 87506

Telephone Number: (505) 455-3566

Email: johnbradley1216@yahoo.com

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

Well number(s): RG 33713 and RG 76624

Physical address of well(s): 3 Las Joyas Lane, Santa Fe, NM 87506

BACKGROUND

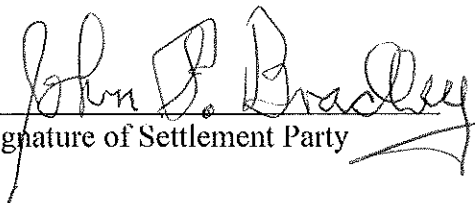
John P. Bradley is currently a settlement party to the Agreement. He signed the Agreement on 2/12/2015 and filed the signed Agreement with the US District Court on 2/13/2015. When he entered into the agreement at that time, John elected to: *connect to the County Water Utility pursuant to Sections 3.1.7.2.1 and 3.1.7.4.1.*

MOTION

John P. Bradley would like to continue to be a settlement party to the Agreement; however, he would like to change his Domestic Well Elections to: *keep his wells 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 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.

John P. Bradley /  8/31/2016
Printed Name / Signature of Settlement Party Date