

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

| | | |
|------------------------------------|---|-------------------------|
| STATE OF NEW MEXICO <i>ex rel.</i> |) | |
| State Engineer, |) | |
| |) | 6:69-cv-07941-BB |
| Plaintiff, |) | |
| v. |) | RIO CHAMA STREAM SYSTEM |
| |) | Rio Cebolla, Section 3 |
| ROMAN ARAGON, <i>et al.</i> , |) | |
| |) | Subfile No. |
| Defendants. |) | CHCB-005-0002 |
| | | (FLAVIO GURULE) |

ANSWER TO COMPLAINT FOR ADJUDICATION OF WATER RIGHTS


COMES NOW, Flavio Gurule, by and through his counsel The Egolf Law Firm, LLC (Brian F. Egolf, Jr., Esq.), and answers the complaint as follows:

| | | |
|-------------------|---------------|-----------------------|
| <u>Subfile No</u> | <u>Object</u> | <u>Claim No Right</u> |
| CHCB-005-0002 | XXX | |

Mr. Gurule objects to paragraph 4(B) of the proposed consent order, which asserts that there is no right to irrigate 15.4 acres in Section 08, Township 28N, Range 04E, N.M.P.M. (13.8 acres in Pt. SE ¼ and 1.6 acres in Pt. SW ¼). The land described in paragraph 4(B) has been irrigated historically and has been the subject of protracted litigation, which has recently ended. Mr. Gurule does not object to any other portion of the proposed consent order.

Respectfully Submitted,

The Egolf Law Firm, LLC

By: 

Brian F. Egolf, Jr.

Counsel to Flavio Gurule

128 Grant Avenue

Suite 301

Santa Fe, New Mexico 87501

(505) 986-9641