

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

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

OCT 14 2016

MATTHEW J. DYKMAN
CLERK

STATE OF NEW MEXICO *ex rel.*
State Engineer,

Plaintiff,
v.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941 MV/KK

RIO CHAMA STREAM SYSTEM
Section 1: Rio del Oso & Rito Vallecitos

ANSWER TO COMPLAINT FOR ADJUDICATION OF WATER RIGHTS

COMES NOW Laura Vigil Coffey - duly appointed (please print your full name)
AGUSTIN & BERNARDITA VIGIL ESTATE *personal representative (daughter) Court appointed*

and answers the Complaint as follows:

<u>Subfile No</u>	<u>Object</u>	<u>Claim No Right</u>
CHRO-005-0002	<input checked="" type="checkbox"/>	<input type="checkbox"/>

1. In answer to Complaint: For each subfile listed above, please **initial** in one of the two boxes to indicate whether you object to the description of water right(s) contained in the State's proposed Consent Order, or whether you make no claim as to the water right(s) described in the State's proposed Consent Order.

If you object to the description of water right(s) and reject the State's proposed Consent Order, or if you make no claim as to the water right(s) set forth in the State's proposed Consent Order for any of the Subfile Numbers listed above, for each such Subfile Number please explain in the appropriate spaces below.

I object to the description of the water right(s) described by Subfile Number(s) CHRO 005-0002
Acequia de los Achucos + Springs 1+2 because
the area allocated for irrigation (covered) is too limited on that
location of my parent's estate. The subfile Aerial Photography
indicate a network of ditches that were not credited. The Rio del Oso

itself winds through close to one acre of our estate. Land along the river was tilled because of the availability of the water. No water rights for irrigation were allotted for this area. What about the "rights" to use the water for other agricultural and domestic use as my family and ancestors have been entitled to since 1887 ^{when} ~~since~~ my great-grandfather claimed a homestead. His descendants have been there ever since then. In a paper titled "Settlement and Irrigation on the Rio del Oro and Rio Vallejos. Dr John G. Oyster, May 2013. "Presently the Vigil family irrigate about twenty acres ---". Currently this is (Attach additional pages if necessary) not ongoing, but we want the water to be available for the future. I made a good faith effort to resolve my disagreement with the State's proposed Consent Order by On Sept. 16 I met with Michael Recker and Leila Reilly, representatives of the State Engrs. staff, attorney at the Albuquerque Rural Center. I took materials, deeds to substantiate my opinion of why I thought my parents' estate was not getting the ample water rights it deserves. Michael and Leila were very pleasant. I certainly enjoyed meeting with them in view of the fact that I was a bit apprehensive of the meeting. I am an octogenarian, but do not consider myself "are all quite elderly". I am however, very attached, very emotional to Los Ruchuelos (sp), the Rio del Oro where my forebears, myself (Attach additional pages if necessary) were born and raised. In the many beautiful memories, I want use of the water to be there for those to come. Thank you LW.

I claim no right for the water right(s) described by Subfile Number(s) _____

because

(Attach additional pages if necessary)

2. I understand that by making this claim and filing this document I am not waiving my rights to later raise, in an Amended Answer, any jurisdictional or affirmative defenses I may have.

Dated: 10/10/2016

Laura Vigil Coffey, Laura Vigil Coffey
(Signature - AGUSTIN & BERNARDITA VIGIL
ESTATE)

4801 Glenwood Hills Dr (Glenwood Hills Dr,
Albuquerque, New Mexico

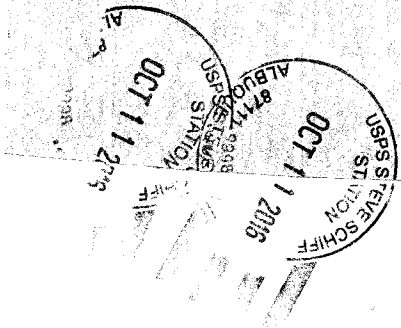
(Address: Print Clearly)

505-296-1942

(Phone Number: Print Clearly)

**The court's address is:
United States District Court Clerk
333 Lomas Blvd. NW, Ste. 270
Albuquerque, NM 87102**

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