

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

FILED  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

07 JUL -5 PM 3: 51

CLERK-ALBUQUERQUE

UNITED STATES OF AMERICA, for Itself  
and as Trustee for the Zuni Indian Tribe, Navajo  
Nation and Ramah Band of Navajos  
and  
STATE OF NEW MEXICO, ex rel. STATE  
ENGINEER,

Plaintiffs,

and

ZUNI INDIAN TRIBE,  
NAVAJO NATION,

Plaintiffs in Intervention,

v.

STATE OF NEW MEXICO COMMISSIONER  
OF PUBLIC LANDS,  
and  
A & R PRODUCTIONS, et. al.,

Defendants.

No. 01cv00072-BB-ACE

ZUNI RIVER BASIN  
ADJUDICATION

Subfile No: ZRB-4-0351

SUBFILE ANSWER

COME(S) NOW JACK L. WOODS & B. ELAINE WOODS and  
answer(s) the complaint as follows:

<u>Subfile No:</u>	<u>Object</u>	<u>Claim No Right</u>
ZRB-4-0351	<input type="checkbox"/> JW BEW	<input type="checkbox"/>

(Instructions: **Initial** in one of the two boxes to indicate whether you object to the description of water right(s) contained in the proposed Consent Order offered by the United States and the State, or whether you make no claim as to the water right(s) described in the proposed Consent Order. Provide the appropriate explanation below, and indicate what you have done to resolve your disagreement with the United States and the State, in the spaces provided below.)

I (We) object to the description of the water right(s) described by the proposed Consent Order for Subfile Number ZRB-4-0351 because:

(explain) WE DO NOT UNDERSTAND WHY IT ONLY IS  
1/4 OF AN ACRE FOOT INSTEAD OF 3 ACRE FEET  
AS HISTORICALLY DONE. WE RECENTLY PURCHASED THESE  
FORTY ACRES WHICH HAD BEEN SUBDIVIDED YEARS AGO  
INTO 10 ACRE PLOTS AND WE ARE LEEERY OF A CONSENT THAT  
WOULD ENDANGER THE RIGHTS OF ANY FUTURE BUYERS OF A 10 ACRE  
(Attach additional pages if necessary) PLOTS

I (We) made a good faith effort to resolve my (our) disagreement with the Consent Order proposed by the United States and the State by:

(describe) DRIVING OVER 300 MILES TO GALLUP N.MEX FROM CABALLO, NM  
TO A CONSULTING MEETING HELD AT THE HOLIDAY  
INN ON APRIL 17, 2007 AND WE ARE STILL CONFUSED.  
THAT IS WHY WE OBJECT TO THIS CONSENT UNTIL IT IS  
CLEAR IN OUR MINDS AS TO HOW IT WILL AFFECT OUR  
PROPERTY.

(Attach additional pages if necessary)

I (We) claim no right for the water right(s) described by the proposed Consent Order for Subfile Number ZRB-4-0351 because:

(explain) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Attach additional pages if necessary)

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

(Instructions: Each named defendant, or the defendant's attorney, must sign and date this Answer. If multiple defendants are named and you have separate addresses or telephone numbers, please attach an additional page providing address information for each defendant. If you are signing on behalf of a named defendant, you must indicate the source of your legal authority to do so and provide both your address and the address of the named defendant.)

Signature(s) – JACK L. WOODS & B. ELAINE WOODS:

7/3/07 Jack L. Woods B. Elaine Woods 7/3/07

P.O. Box 22  
CABALLO, N.M. 87931  
(Address: Print Clearly)

505-743-9017  
(Phone Number: Print Clearly)

**IMPORTANT: Within 20 days of June 27, 2007, you must EITHER accept the last Consent Order offered by the United States and the State for Subfile ZRB-4-0351 OR file an answer in this Subfile with United States District Court for the District of New Mexico. Any right you may have to use waters of the stream system may be adjudicated by default judgment in conformity with the Consent Order proposed by the United States and the State if you fail to accept the proposed Consent Order or file an answer within 20 days of June 27, 2007. The court's address is 333 Lomas NW, Suite 270, Albuquerque, NM 87102. A copy of the answer filed with the district court must also be sent to counsel for the United States and counsel for the State at the following addresses:**

**BRADLEY S. BRIDGEWATER**  
U.S. Department of Justice  
1961 Stout Street – 8<sup>th</sup> Floor  
Denver, CO 80294

**EDWARD BAGLEY**  
Office of the State Engineer, Legal Division  
P.O. Box 25102  
Santa Fe, NM 87504