

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

UNITED STATE OF AMERICA, and)	
STATE OF NEW MEXICO, ex rel. STATE)	
ENGINEER,)	
)	
Plaintiffs,)	
)	CIV. NO. 01-00072 BDB/WDS
and)	
)	ZUNI RIVER BASIN
ZUNI INDIAN TRIBE, NAVAJO NATION,)	ADJUDICATION
)	
Plaintiffs-in-Intervention,)	Subfile No. ZRB 1-0100
)	JOANN STRICKLAND TRUST
v.)	
)	
A & R PRODUCTIONS, et al.,)	
)	
Defendants.)	
)	
_____)	

AMENDED SUBFILE ANSWER

COMES NOW, Joann Strickland, Trustee for the Joann Strickland Trust, by and through her attorneys of record, Law & Resource Planning Associates, P.C., and hereby submits this Amended Answer to the Complaint, leave having been granted to amend her Answer in the Court's Memorandum Opinion and Order dated March 16, 2010 (Doc 2555).

<u>Subfile No:</u>	<u>Object</u>	<u>Claim No Right</u>
ZRB 1-0100	X	

(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) and indicate what you have done to resolve your disagreement with the United States and the State, in the spaces provided below.)

I object to the description of the water right(s) described by the proposed Consent Order for Subfile Number **ZRB 1 – 0100** because: (explain) The amount offered for my NMSA 1978, § 72-12-1 well does not reflect actual historical beneficial use of the water, nor does it comport with the underlying legislative policy of allowing permittees of § 72-12-1 wells sufficient water to irrigate up to one acre of noncommercial trees, lawn or garden, and for domestic uses and livestock uses. The amounts offered for livestock use do not reflect the actual historical beneficial use of water in my livestock operations.

(Attach additional pages if necessary)

I made a good faith effort to resolve my (our) disagreement with the Consent Order proposed by the United States and the State by:
(describe) I have requested a consultation and attended a consultation with family members. A consultation has not yet been scheduled for my subfile.

(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- because:
(explain) _____

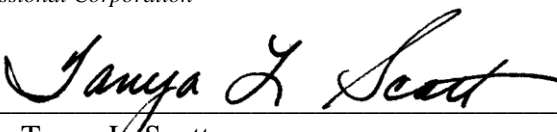
(Attach additional pages if necessary)

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.)

Respectfully submitted,

LAW & RESOURCE PLANNING ASSOCIATES,
A Professional Corporation

By: 
Tanya L. Scott
Attorney at Law
Albuquerque Plaza
201 3rd Street NW, Ste. 1750
Albuquerque, NM 87102
(505) 346-0998 / FAX: (505) 346-0997

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 28, 2010, I filed the foregoing Amended Subfile Answer electronically through the CM/ECF system, which caused the parties or counsel reflected on the Notice of Filing to be served by electronic means.


Tanya L. Scott