



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

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UNITED STATES OF AMERICA,

and

STATE OF NEW MEXICO ex rel.
STATE ENGINEER,

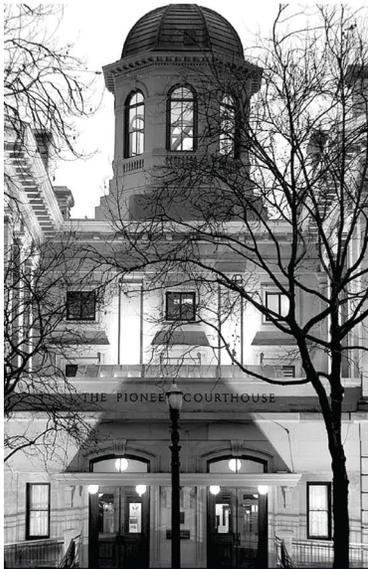
Plaintiffs,

No. 01cv00072-MV/JHR
ZUNI RIVER BASIN
ADJUDICATION
Subfile No. ZRB-1-0148

v.

A & R PRODUCTIONS, et al.,

Defendants.



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KARL A. HOFFMAN

TAKEN ON
WEDNESDAY, FEBRUARY 10, 2021
10:03 A.M.

LAW AND RESOURCE PLANNING ASSOCIATES, P.C.
201 THIRD STREET NORTHWEST, SUITE 1750
ALBUQUERQUE, NEW MEXICO 87102

EXHIBIT B

1 earlier.

2 You mentioned that it became non-
3 operational maybe six or seven years ago; is that
4 correct?

5 A. Yes, sir.

6 Q. Okay. Before it became non-operational,
7 had you performed any electrical work related to
8 that well during the course of its operation?

9 A. Yes. We've lost a motor on it once
10 before, I believe, maybe twice. Lightning out
11 there, it plays havoc on everything. And so if they
12 had to replace a motor, then I went out there and
13 disconnected it so they could pull it out, and then
14 reconnected it to get it going again.

15 Q. Okay. And -- and you recall that you --
16 you -- you did that at least once?

17 A. At least once and maybe twice.

18 Q. Okay. Do you recall ever changing out,
19 installing a new meter on that well over the course
20 of time?

21 A. I never worked on water meter. That's the
22 pump guy and the -- that's -- I just did the
23 electrical.

24 Q. Okay. Are you familiar at all, during the
25 course of that well's operation, with its pumping

1 **capacity?**

2 A. It's a two-horse motor, and it was
3 probably anywhere from five to ten gallons a minute.
4 It would depend on the depth of the well and I can't
5 tell you how deep that is.

6 **Q. Okay. Let's talk about the other well**
7 **now, the one that's still operational, that's W11.**

8 A. Okay.

9 **Q. Subsequent to the work you did when that**
10 **well was installed, working on the pump and the**
11 **electrical -- the electrical power to that well, had**
12 **you performed work on that well since then over the**
13 **course of time to the -- to the present?**

14 A. I worked on it when we had it running on
15 generators. I worked on it since we've had it
16 running on three-phase power through the converters.
17 And numerous times that we have lost that pump due
18 to lightning or something. So I probably worked on
19 that thing four, five, six times. I don't remember
20 how many times. But quite a few times.

21 **Q. Is it fair to -- is it fair for me to**
22 **describe the work that you've done on that well as**
23 **basically keeping it pumping?**

24 A. Yes, sir. They need that thing running
25 24/7.