



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,

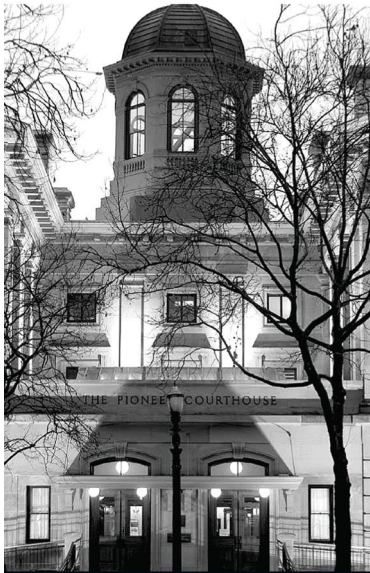
Plaintiffs,

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.