

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

UNITED STATES OF AMERICA, and)	
STATE OF NEW MEXICO, ex rel. STATE)	No. CV 01-00072 MV/JHR
ENGINEER,)	
)	ZUNI RIVER BASIN
Plaintiffs,)	ADJUDICATION
)	
and)	
)	Subfile No. ZRB-1-0148
ZUNI INDIAN TRIBE, NAVAJO NATION,)	
)	
Plaintiffs in Intervention,)	
)	
v.)	
)	
A & R PRODUCTIONS, et al.,)	
)	
Defendants.)	
)	

**DEFENDANTS' ANSWERS TO
PLAINTIFF UNITED STATES OF AMERICA'S FIRST COMBINED
DISCOVERY REQUESTS DIRECTED TO SUBFILE DEFENDANT NORMA M. MEECH**

**To: Norma M. Meech, c/o Tanya L. Scott, Esq., Law and Resource Planning Associates, P.C.,
Albuquerque Plaza, 201 Third Street NW, Suite 1750, Albuquerque, NM 87102,
tls@lrpa-usa.com**

Pursuant to Rules 26, 33, 34, and 36 of the Federal Rules of Civil Procedure, the Local Civil Rules, and the *Order Setting Case Management Deadlines and Discovery Parameters* (Doc. 3455), the United States of America hereby requests that Subfile Defendant Norma M. Meech answer the following discovery requests, separately and fully, in writing and under oath, within thirty (30) days after receipt thereof.

These interrogatories, requests for admissions, and document requests shall be deemed continuing so as to require supplemental answers and responses pursuant to Federal Rule of Civil Procedure 26(e) if the Subfile Defendant obtains additional information after service of her

ANSWER:

Sand and gravel is not “mined” from La Tinaja Mine. C&E Concrete mines limestone at La Tinaja Mine. From the limestone, a variety of products are produced, including rip-rap, sand and gravel products and a finely ground limestone used at coal fired power plants for pollution control.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 10: If your response to Request for Admission No. 3 is anything other than an unqualified admission, please produce all documents, including draft documents and notes, upon which you rely to support, or which relate or refer in any way to, your answer to Request for Admission No. 3.

RESPONSE:

Defendant objects to this Request for Production as being overly broad. Producing all documents that reflect the products that are produced from the limestone mined at La Tinaja would require the production of thousands of invoices, orders, product literature and descriptions, and production data.

INTERROGATORY NO. 14: For each and every water meter used in the operation of Well 8B-1-W10 (NMOSE File No. G 00336) since the well’s completion, please identify:

- a. the manufacturer and model number of each water meter used;
- b. the dates of use of each water meter;
- c. where the water meter was purchased; and
- d. the person who installed the water meter.

ANSWER:

- a. Pictures of the meters used on G-336 (Well 8B-1-W10) showing the manufacturer and model number of the original meter and the current meter has been provided. See Exhibit O of documents provided in Defendant’s Initial Disclosures.
- b. C&E does not have records of the dates of use of each water meter.
- c. C&E does not have records where its water meters were purchased. They were likely purchased from either L&C Pump and Pipe or from Coyote Drilling, both of which have worked on the wells.

d. See paragraph c above.

INTERROGATORY NO. 15: For each and every water meter used in the operation of Well 8B-1-W11 (NMOSE File No. G 00337) since the well's completion, please identify:

- a. the manufacturer and model number of each water meter used;
- b. the dates of use of each water meter;
- c. where the water meter was purchased; and
- d. the person who installed the water meter.

ANSWER:

Pictures of the meters used on G-337(Well 8B-1-W11) showing the manufacturer and model number of the original meter and the current meter has been provided. See Exhibit O of documents provided in Defendant's Initial Disclosures.

- b. C&E does not have records of the dates of use of each water meter.
- c. C&E does not have records where its water meters were purchased. They were likely purchased from either L&C Pump and Pipe or from Coyote Drilling, both of which have worked on the wells.
- d. See paragraph c above.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 11: Please produce copies of any and all original hand-written well logs for Wells 8B-1-W10 (NMOSE File No. G 00336) and 8B-1-W11 (NMOSE File No. G 00337).

RESPONSE:

C&E does not understand what a hand-written "well log" is. If "well log" means a hand-written recordation of meter readings, C&E does not maintain any handwritten information from the meters.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 12: Please produce copies of any and all original hand-written meter logs for Wells 8B-1-W10 (NMOSE File No. G 00336) and 8B-1-W11 (NMOSE File No. G 00337).