

No. 141, Original

IN THE  
SUPREME COURT OF THE UNITED STATES

◆  
STATE OF TEXAS,

*Plaintiff,*

v.

STATE OF NEW MEXICO and  
STATE OF COLORADO,

*Defendants.*

◆  
**OFFICE OF THE SPECIAL MASTER**

◆  
**STATE OF NEW MEXICO'S RESPONSE TO  
THE STATE OF TEXAS'S OBJECTION AND REQUEST TO  
STRIKE CUMULATIVE AND/OR DUPLICATIVE WITNESS TESTIMONY  
AND REQUEST FOR CONFIRMATION OF WITNESS LIST**

HECTOR H. BALDERAS  
New Mexico Attorney General  
TANIA MAESTAS  
Deputy Attorney General  
CHOLLA KHOURY  
Assistant Attorney General  
ZACHARY E. OGAZ  
Assistant Attorney General  
P.O. Drawer 1508  
Santa Fe, New Mexico 87501  
505-239-4672

MARCUS J. RAEL, JR.\*  
LUIS ROBLES  
SUSAN BARELA  
Special Assistant Attorneys General  
Robles Rael & Anaya  
500 Marquette Ave NW #700  
Albuquerque, NM 87102  
[marcus@roblesrael.com](mailto:marcus@roblesrael.com)  
505-242-2228

*\*Counsel of Record*

October 18, 2021

New Mexico hereby responds in opposition to Texas’s Objection and Request to Strike Cumulative and/or Duplicative Witness Testimony and Request for Confirmation of Witness List (October 15, 2021) (“Texas Motion”). New Mexico has respected the rights of Texas to present their case as they deem appropriate. New Mexico is confident that the evidence will vindicate and support its claims, so it has advocated for a full and complete record. Unfortunately, Texas has not taken the same approach. The Texas Motion is Texas’s latest gambit to limit the evidence the Supreme Court considers. Texas’s Motion should be denied for the following four reasons.

**I. THE COURT REQUIRES THE DEVELOPMENT OF A FULL RECORD IN ORIGINAL ACTIONS**

As the Special Master has previously acknowledged, the nature of this proceeding requires development of a complete evidentiary record. *E.g. United States v. Texas*, 339 U.S. 707, 715 (1950) (The Court, “in original actions, passing as it does on controversies between sovereigns which involve issues of high public importance, has always been liberal in allowing full development of the facts.” (citations omitted); *Rhode Island v. Massachusetts*, 39 U.S. 210, 257 (1840) (Court allows full development of the record in original actions “in order to enable both parties to present their respective claims in their full strength”). In its ongoing push to limit New Mexico’s case, Texas has repeatedly ignored this principle.

In practice, however, Special Masters have carefully guarded the right of the sovereign States to present their case at its full strength. For example, in *Montana v. Wyoming*, Special Master Thompson heard evidence from seven (7) different farmers from the State of Wyoming and eight (8) different farmers from the State of Montana. The farmers’ testimony is critical to understanding impacts of Project operations and this practice should be applied in this case.

## **II. TEXAS SHOULD NOT BE ALLOWED TO LIMIT NEW MEXICO'S CASE**

Disputes in the original jurisdiction present important issues impacting hundreds of thousands of people. As neighbors and sovereign States, New Mexico and Texas should respect each other's right to represent their citizens and present their case in a manner befitting of the nature and dignity of the dispute. New Mexico has respected Texas's right to select its witnesses and present its case; Texas should do the same.

## **III. THE TESTIMONY FROM NEW MEXICO FARMERS WILL NOT BE CUMULATIVE**

This case is about the apportionment of water between two States that was accomplished through reliance on an existing Reclamation Project that was built to serve irrigation demands. Since the case focuses on irrigation and agriculture, there are numerous topics and issues on which farmers can offer valuable insights. New Mexico has no interest in presenting the same testimony from four witnesses, and it has no intention to do so. Rather, New Mexico carefully selected its witnesses to cover different issues in New Mexico such as water availability, salinity, irrigation practices, crop demands, cropping patterns, differences throughout the basin in New Mexico, historic water use in the valley, the importance of agriculture to New Mexico, the impact of the 2008 Operating Agreement on New Mexico farmers, regulation of agricultural water use in New Mexico, and other relevant issues. The four New Mexico farmers provide diversity in location, crops, and techniques that will aid in understanding the case.

As explained below, Texas does not understand the testimony the New Mexico farmers will present because it chose not to take their depositions. Texas should not be allowed to benefit from its recalcitrance. The testimony of the New Mexico farmers will not be duplicative, and the Texas Motion should be denied.

#### **IV. TEXAS'S MOTION IS PREMATURE**

Next, the Texas Motion is premature. Texas makes an assumption that the New Mexico farmer witnesses will offer identical, duplicative, or cumulative testimony based on the short summary contained in a witness list. It is not uncommon for such lists to contain similar descriptions. Typically, the Parties are generally aware of the testimony that each witness will give based on depositions taken during discovery. In this case, however, Texas chose not to depose Shayne Franzoy, Randy Garay, David Salopek, or Sally Stahmann-Solis. Because Texas has never deposed the New Mexico farmer witnesses, and it has no basis for claiming that their testimony will be duplicative or cumulative. Rather than assume from a summary description that the witnesses will be duplicative, Texas is required to listen to the testimony, and if the testimony is inappropriately cumulative, Texas can object at trial.

#### **V. TEXAS SHOULD BE REQUIRED TO CONFER BEFORE FILING A MOTION**

Finally, it would save the Special Master and the Parties significant time if Texas would pay New Mexico the simple courtesy of discussing issues prior to filing a motion. The present Motion is a good example. Had Texas simply raised the issue with New Mexico, New Mexico could have explained the intent of the testimony and the “may-call” list,<sup>1</sup> and the Parties could have avoided the extra time and expense of unnecessary motions practice. Texas should be required to confer before filing future motions.

#### **CONCLUSION**

The Special Master should overrule Texas’s objection and deny the request.

---

<sup>1</sup> Texas is mistaken that New Mexico has not identified the “may-call” former New Mexico State Engineers. They are identified as Tom Blaine, Tom Turney, and Scott Verhines in the very document cited in the Texas Motion: Appendix B of the State of New Mexico’s Pretrial Conference Statement filed on August 25, 2021 [Dkt. 565], at item 56, page 15.

Dated: October 18, 2021

Respectfully submitted,

By: /s/ Jeffrey J. Wechsler  
Jeffrey J. Wechsler

HECTOR H. BALDERAS  
New Mexico Attorney General  
TANIA MAESTAS  
Deputy Attorney General  
CHOLLA KHOURY  
Assistant Attorney General  
ZACHARY E. OGAZ  
Assistant Attorney General  
P.O. Drawer 1508  
Santa Fe, New Mexico 87501  
505-239-4672

JEFFREY J. WECHSLER  
Special Assistant Attorney General  
KALEB W. BROOKS  
MONTGOMERY & ANDREWS, P.A.  
325 Paseo de Peralta  
Santa Fe, NM 87501  
[jwechsler@montand.com](mailto:jwechsler@montand.com)

JOHN B. DRAPER  
Special Assistant Attorney General  
CORINNE E. ATTON  
DRAPER & DRAPER LLC  
325 Paseo de Peralta  
Santa Fe, NM 87501  
[john.draper@draperllc.com](mailto:john.draper@draperllc.com)  
505-570-4591

MARCUS J. RAEL, JR.\*  
LUIS ROBLES  
SUSAN BARELA  
Special Assistant Attorneys General  
Robles Rael & Anaya  
500 Marquette Ave NW #700  
Albuquerque, NM 87102  
[marcus@roblesrael.com](mailto:marcus@roblesrael.com)  
505-242-2228

*\*Counsel of Record*

BENNETT W. RALEY  
LISA M. THOMPSON  
MICHAEL A. KOPP  
Special Assistant Attorneys General  
TROUT RALEY  
1120 Lincoln Street, Suite 1600  
Denver, Colorado 80203  
303-861-1963

No. 141, Original

IN THE  
SUPREME COURT OF THE UNITED STATES

◆  
\_\_\_\_\_  
STATE OF TEXAS,

*Plaintiff,*

v.

STATE OF NEW MEXICO and  
STATE OF COLORADO,

*Defendants.*

◆  
\_\_\_\_\_  
**OFFICE OF THE SPECIAL MASTER**

◆  
\_\_\_\_\_  
**STATE OF NEW MEXICO'S CERTIFICATE OF SERVICE**

◆  
\_\_\_\_\_

This is to certify that on October 18, 2021, I caused a true and correct copy of the **STATE OF NEW MEXICO'S RESPONSE TO THE STATE OF TEXAS'S OBJECTION AND REQUEST TO STRIKE CUMULATIVE AND/OR DUPLICATIVE WITNESS TESTIMONY AND REQUEST FOR CONFIRMATION OF WITNESS LIST** to be served by e-mail and U.S. Mail upon the Special Master and by e-mail upon all counsel of record and interested parties on the Service List, attached hereto.

Respectfully submitted this 18th day of October, 2021.

*/s/ Michael A. Kopp*

Michael A. Kopp  
Special Assistant Attorney General  
TROUT RALEY  
1120 Lincoln Street, Suite 1600  
Denver, Colorado 80203  
(303) 861-1963

**SPECIAL MASTER**

**HONORABLE MICHAEL J. MELLOY**

*Special Master*

United States Circuit Judge  
111 Seventh Avenue, S.E., Box 22  
Cedar Rapids, IA 52401-2101

[TXvNM141@ca8.uscourts.gov](mailto:TXvNM141@ca8.uscourts.gov)  
(319) 432-6080  
(service via email and U.S. Mail)

**MICHAEL E. GANS**

*Clerk of the Court*

United States Court of Appeals - Eighth Circuit  
Thomas F. Eagleton United States Courthouse  
111 South 10th Street, Suite 24.329  
St. Louis, MO 63102

[TXvNM141@ca8.uscourts.gov](mailto:TXvNM141@ca8.uscourts.gov)  
(314) 244-2400

**MEDIATOR**

**HON. OLIVER W. WANGER (USDJ RET.)**

WANGER JONES HELSLEY PC  
265 E. River Park Circle, Suite 310  
Fresno, California 93720

[owanger@wjhattorneys.com](mailto:owanger@wjhattorneys.com)  
(559) 233-4800 Ext. 203

**DEBORAH L. PELL (Paralegal)**

[dpell@whjattorneys.com](mailto:dpell@whjattorneys.com)

**UNITED STATES**

**BRIAN H. FLETCHER\***

*Acting Solicitor General*

**TODD KIM**

*Assistant Attorney General*

**EDWIN S KNEEDLER**

*Deputy Solicitor General*

**FREDERICK LIU**

*Assistant to the Solicitor General*

U.S. DEPARTMENT OF JUSTICE  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

[supremectbriefs@usdoj.gov](mailto:supremectbriefs@usdoj.gov)  
(202)514-2217

**JAMES J. DUBOIS\***

**R. LEE LEININGER**

U.S. DEPARTMENT OF JUSTICE  
Environment & Natural Resources Division  
999 18th Street  
South Terrace – Suite 370  
Denver, Colorado 80202

[james.dubois@usdoj.gov](mailto:james.dubois@usdoj.gov)  
(303) 844-1375  
[lee.leininger@usdoj.gov](mailto:lee.leininger@usdoj.gov)  
(303) 844-1364

**SETH C. ALLISON, Paralegal**

[Seth.allison@usdoj.gov](mailto:Seth.allison@usdoj.gov)  
(303)844-7917

**JUDITH E. COLEMAN**  
**JENNIFER A. NAJJAR**  
U.S. DEPARTMENT OF JUSTICE  
Environment & Natural Resources Division  
P.O. Box 7611  
Washington, D.C. 20044-7611

[Judith.coleman@usdoj.gov](mailto:Judith.coleman@usdoj.gov)  
(202) 514-3553  
[jennifer.najjar@usdoj.gov](mailto:jennifer.najjar@usdoj.gov)  
(202) 305-0476

**STATE OF NEW MEXICO**

**HECTOR H. BALDERAS**  
*New Mexico Attorney General*  
**TANIA MAESTAS**  
*Chief Deputy Attorney General*  
**CHOLLA KHOURY**  
*Assistant Attorney General*  
**ZACHARY E. OGAZ**  
*Assistant Attorney General*  
STATE OF NEW MEXICO  
P.O. Drawer 1508  
Santa Fe, New Mexico 87501  
**PATRICIA SALAZAR** - Assistant  
**JENNIFER VAN WIEL** - Paralegal

[hbalderas@nmag.gov](mailto:hbalderas@nmag.gov)  
[tmaestas@nmag.gov](mailto:tmaestas@nmag.gov)  
[ckhoury@nmag.gov](mailto:ckhoury@nmag.gov)  
[zogaz@nmag.gov](mailto:zogaz@nmag.gov)  
[psalazar@nmag.gov](mailto:psalazar@nmag.gov)  
[jvanwiel@nmag.gov](mailto:jvanwiel@nmag.gov)  
(505) 239-4672

**MARCUS J. RAEL, JR.\***  
**LUIS ROBLES**  
**SUSAN BARELA**  
*Special Assistant Attorneys General*  
ROBLES, RAEL & ANAYA, P.C.  
500 Marquette Avenue NW, Suite 700  
Albuquerque, New Mexico 87102  
**CHELSEA SANDOVAL** - Paralegal  
**PAULINE WAYLAND** – Paralegal  
**BONNIE DEWITT** – Paralegal

[marcus@roblesrael.com](mailto:marcus@roblesrael.com)  
[luis@roblesrael.com](mailto:luis@roblesrael.com)  
[susan@roblesrael.com](mailto:susan@roblesrael.com)  
[chelsea@roblesrael.com](mailto:chelsea@roblesrael.com)  
[pauline@roblesrael.com](mailto:pauline@roblesrael.com)  
[bonnie@roblesrael.com](mailto:bonnie@roblesrael.com)  
(505) 242-2228

**BENNETT W. RALEY**  
**LISA M. THOMPSON**  
**MICHAEL A. KOPP**  
*Special Assistant Attorneys General*  
TROUT RALEY  
1120 Lincoln Street, Suite 1600  
Denver, Colorado 80203

[braley@troutlaw.com](mailto:braley@troutlaw.com)  
[lthompson@troutlaw.com](mailto:lthompson@troutlaw.com)  
[mkopp@troutlaw.com](mailto:mkopp@troutlaw.com)  
(303) 861-1963

**JEFFREY WECHSLER**

[jwechsler@montand.com](mailto:jwechsler@montand.com)



**SHELLY L. DALRYMPLE**

**KALEB W. BROOKS**

*Special Assistant Attorney General*

**MONTGOMERY & ANDREWS**

325 Paseo De Peralta

Santa Fe, NM 87501

**DIANA LUNA** – Paralegal

[sdalrymple@montand.com](mailto:sdalrymple@montand.com)

[kwbrooks@montand.com](mailto:kwbrooks@montand.com)

(505) 986-2637

[dluna@montand.com](mailto:dluna@montand.com)

**JOHN DRAPER**

**CORINNE ATTON**

*Special Assistant Attorney General*

**DRAPER & DRAPER LLC**

325 Paseo De Peralta

Santa Fe, NM 87501

**DONNA ORMEROD** – Paralegal

[john.draper@draperllc.com](mailto:john.draper@draperllc.com)

[corinne.atton@draperllc.com](mailto:corinne.atton@draperllc.com)

(505) 570-4591

[donna.ormerod@draperllc.com](mailto:donna.ormerod@draperllc.com)

## STATE OF COLORADO

**PHILIP J. WEISER**

*Attorney General of Colorado*

**ERIC R. OLSON**

*Solicitor General*

**LAIN LEONIAK**

*Acting First Assistant Attorney General*

**CHAD M. WALLACE\***

*Senior Assistant Attorney General*

**PRESTON V. HARTMAN**

*Assistant Attorney General*

**COLORADO DEPARTMENT OF LAW**

Ralph Carr Judicial Center

7<sup>th</sup> Floor

1300 Broadway

Denver, CO 80203

**NAN EDWARDS**, Paralegal II

[eric.olson@coag.gov](mailto:eric.olson@coag.gov)

[chad.wallace@coag.gov](mailto:chad.wallace@coag.gov)

(720) 508-6281 (direct)

[preston.hartman@coag.gov](mailto:preston.hartman@coag.gov)

(720) 508-6257 (direct)

[nan.edwards@coag.gov](mailto:nan.edwards@coag.gov)

## STATE OF TEXAS

**STUART SOMACH\***

**ANDREW M. HITCHINGS**

**ROBERT B. HOFFMAN**

**FRANCIS M. GOLDSBERRY II**

**THERESA C. BARFIELD**

**SARAH A. KLAHN**

**BRITTANY K. JOHNSON**

**RICHARD S. DEITCHMAN**

**SOMACH SIMMONS & DUNN, PC**

[ssomach@somachlaw.com](mailto:ssomach@somachlaw.com)

[ahitchings@somachlaw.com](mailto:ahitchings@somachlaw.com)

[rhoffman@somachlaw.com](mailto:rhoffman@somachlaw.com)

[mgoldsberry@somachlaw.com](mailto:mgoldsberry@somachlaw.com)

[tbarfield@somachlaw.com](mailto:tbarfield@somachlaw.com)

[sklahn@somachlaw.com](mailto:sklahn@somachlaw.com)

[bjohnson@somachlaw.com](mailto:bjohnson@somachlaw.com)

[rdeitchman@somachlaw.com](mailto:rdeitchman@somachlaw.com)

(916) 446-7979

500 Capital Mall, Suite 1000  
Sacramento, CA 95814-2403  
**CORENE RODDER - Secretary**  
**CRYSTAL RIVERA - Secretary**  
**YOLANDA DE LA CRUZ - Paralegal**

(916) 803- 4561 (cell)

[crodder@somachlaw.com](mailto:crodder@somachlaw.com)  
[crivera@somachlaw.com](mailto:crivera@somachlaw.com)  
[ydelacruz@somachlaw.com](mailto:ydelacruz@somachlaw.com)

**KEN PAXTON**

*Attorney General of Texas*

**BRENT WEBSTER**

*First Assistant Attorney General*

**GRANT DORFMAN**

*Deputy First Assistant Attorney General*

**SHAWN COWLES**

*Deputy Attorney General for Civil Litigation*

**WILLIAM F. COLE**

*Assistant Solicitor General*

**BEAU CARTER**

*Assistant Solicitor General*

**PRISCILLA M. HUBENAK**

*Chief, Environmental Protection Division*

OFFICE OF ATTORNEY GENERAL

OF TEXAS

P.O. Box 12548

Austin, TX 78711-2548

(512) 463-2012

(512) 457-4644 Fax

[Priscilla.Hubenak@oag.texas.gov](mailto:Priscilla.Hubenak@oag.texas.gov)

**AMICI / FOR INFORMATIONAL PURPOSES ONLY**

**ALBUQUERQUE BERNALILLO COUNTY WATER UTILITY AUTHORITY**

**JAMES C. BROCKMANN\***

(505) 983-3880

**JAY F. STEIN**

[jcbrockmann@newmexicowaterlaw.com](mailto:jcbrockmann@newmexicowaterlaw.com)

STEIN & BROCKMANN, P.A.

[jfstein@newmexicowaterlaw.com](mailto:jfstein@newmexicowaterlaw.com)

P.O. Box 2067

[administrator@newmexicowaterlaw.com](mailto:administrator@newmexicowaterlaw.com)

Santé Fe, New Mexico 87504

**Administrative Copy**

**PETER AUH**

(505) 289-3092

ALBUQUERQUE BERNALILLO COUNTY

[pauh@abcwua.org](mailto:pauh@abcwua.org)

WATER UTILITY AUTHORITY

P.O. Box 568

Albuquerque, NM 87103-0568

**CITY OF EL PASO**

**DOUGLAS G. CAROOM\***  
**SUSAN M. MAXWELL**  
BICKERSTAFF HEATH DELGADO  
ACOSTA, LLP  
2711 S. MoPac Expressway  
Building One, Suite 300  
Austin, TX 78746

(512) 472-8021  
[dcaroom@bickerstaff.com](mailto:dcaroom@bickerstaff.com)  
[smaxwell@bickerstaff.com](mailto:smaxwell@bickerstaff.com)

## CITY OF LAS CRUCES

**JAY F. STEIN \***  
**JAMES C. BROCKMANN**  
STEIN & BROCKMANN, P.A.  
P.O. Box 2067  
Santé Fe, New Mexico 87504  
**Administrative Copy**

(505) 983-3880  
[jcbrockmann@newmexicowaterlaw.com](mailto:jcbrockmann@newmexicowaterlaw.com)  
[jfstein@newmexicowaterlaw.com](mailto:jfstein@newmexicowaterlaw.com)  
[administrator@newmexicowaterlaw.com](mailto:administrator@newmexicowaterlaw.com)

**JENNIFER VEGA-BROWN**  
**ROBERT CABELLO**  
LAW CRUCES CITY ATTORNEY'S OFFICE  
P.O. Box 20000  
Las Cruces, New Mexico 88004

(575) 541-2128  
[jvega-brown@las-cruces.org](mailto:jvega-brown@las-cruces.org)  
[rcabello@las-cruces.org](mailto:rcabello@las-cruces.org)

## ELEPHANT BUTTE IRRIGATION DISTRICT

**SAMANTHA R. BARNCastle\***  
BARNCastle LAW FIRM, LLC  
1100 South Main, Suite 20 (88005)  
P.O. Box 1556  
Las Cruces, NM 88004  
**JANET CORRELL – Paralegal**

(575) 636-2377  
(575) 636-2688 (fax)  
[samantha@h2o-legal.com](mailto:samantha@h2o-legal.com)  
[janet@h2o-legal.com](mailto:janet@h2o-legal.com)

## EL PASO COUNTY WATER IMPROVEMENT DISTRICT NO. 1

**MARIA O'BRIEN\***  
**SARAH M. STEVENSON**  
MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, PA  
500 Fourth Street N.W., Suite 1000  
Albuquerque, New Mexico 87103-2168  
**CHARLIE PADILLA – Legal Assistant**

(505) 848-1803 (direct)  
[mobrien@modrall.com](mailto:mobrien@modrall.com)  
[sarah.stevenson@modrall.com](mailto:sarah.stevenson@modrall.com)  
[charliep@modrall.com](mailto:charliep@modrall.com)

**RENEA HICKS**  
LAW OFFICE OF MAX RENE HICKS  
P.O.Box 303187

[rhicks@renea-hicks.com](mailto:rhicks@renea-hicks.com)  
(512)480-8231

Austin, TX 78703-0504

**HUDSPETH COUNTY CONSERVATION AND RECLAMATION DISTRICT NO. 1**

**ANDREW S. “DREW” MILLER\***  
KEMP SMITH LLP  
919 Congress Avenue, Suite 1305  
Austin, TX 78701

(512) 320-5466  
[dmiller@kempsmith.com](mailto:dmiller@kempsmith.com)

**STATE OF KANSAS**

**DEREK SCHMIDT**  
*Attorney General of Kansas*  
**JEFFREY A. CHANAY**  
*Chief Deputy Attorney General*  
**TOBY CROUSE\***  
*Solicitor General of Kansas*  
**BRYAN C. CLARK**  
*Assistant Solicitor General*  
**DWIGHT R. CARSWELL**  
*Assistant Attorney General*  
120 S. W. 10th Ave., 2nd Floor  
Topeka, KS 66612

(785) 296-2215  
[toby.crouse@ag.ks.gov](mailto:toby.crouse@ag.ks.gov)  
[bryan.clark@ag.ks.gov](mailto:bryan.clark@ag.ks.gov)

**NEW MEXICO PECAN GROWERS**

**TESSA T. DAVIDSON\***  
DAVIDSON LAW FIRM, LLC  
4206 Corrales Road  
P.O. Box 2240  
Corrales, NM 87048  
**JO HARDEN – Paralegal**

[ttd@tessadavidson.com](mailto:ttd@tessadavidson.com)  
(505) 792-3636  
  
[jo@tessadavidson.com](mailto:jo@tessadavidson.com)

**NEW MEXICO STATE UNIVERSITY**

**JOHN W. UTTON\***  
UTTUN & KERY, P.A.  
P.O. Box 2386  
Santa Fe, New Mexico 87504

(505) 699-1445  
[john@uttonkery.com](mailto:john@uttonkery.com)

*General Counsel*  
New Mexico State University  
Hadley Hall Room 132  
2850 Weddell Road  
Las Cruces, NM 88003

[gencounsel@nmsu.edu](mailto:gencounsel@nmsu.edu)  
(575) 646-2446

**SOUTHERN RIO GRANDE DIVERSIFIED CROP FARMERS ASSOCIATION**

**ARNOLD J. OLSEN\***  
HENNIGHAUSEN OLSEN & MCCREA, L.L.P.  
P.O. Box 1415  
Roswell, NM 88202-1415  
**Malina Kauai, Paralegal**  
**Rochelle Bartlett, Legal Assistant**

(575) 624-2463  
[ajolsen@h2olawyers.com](mailto:ajolsen@h2olawyers.com)

[mkauai@h2olawyers.com](mailto:mkauai@h2olawyers.com)  
[rbartlett@h2olawyers.com](mailto:rbartlett@h2olawyers.com)