

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

**THE STATE OF TEXAS'S NOTICE OF EXHIBIT
DISCLOSURES AND OBJECTIONS**

STUART L. SOMACH, ESQ.*
ANDREW M. HITCHINGS, ESQ.
ROBERT B. HOFFMAN, ESQ.
FRANCIS M. GOLDSBERRY II, ESQ.
THERESA C. BARFIELD, ESQ.
SARAH A. KLAHN, ESQ.
BRITTANY K. JOHNSON, ESQ.
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**Counsel of Record*

October 10, 2021

In response to the Special Master's September 16, 2021 Order regarding Remote Trial Proceedings, the State of Texas provides the following exhibit disclosures and objections for Jesus Reyes. As of this filing, the parties anticipate that Mr. Reyes is expected to testify on October 11, 2021. Accordingly, the State of Texas provides the following:

Attachment 1: The Jesus Reyes direct-examination exhibit index, which identifies the State of New Mexico's objections.

Attachment 2: The Jesus Reyes cross-examination exhibit index, which identifies the State of Texas's objections.

All exhibits, indexes, and related exhibits have been uploaded to Box.com and are available for the parties to access and download. In an effort to resolve these objections, the parties have met and conferred in good faith.

Respectfully submitted,

Dated: October 10, 2021

s/ Stuart L. Somach
STUART L. SOMACH, ESQ.*
ANDREW M. HITCHINGS, ESQ.
ROBERT B. HOFFMAN, ESQ.
FRANCIS M. GOLDSBERRY II, ESQ.
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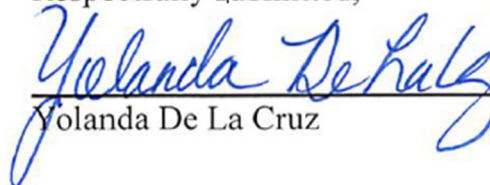
Defendants.

OFFICE OF THE SPECIAL MASTER

CERTIFICATE OF SERVICE

This is to certify that on this 10th day of October 2021, I caused a true and correct copy of **THE STATE OF TEXAS'S NOTICE OF EXHIBIT DISCLOSURE AND OBJECTIONS** to be served upon all parties and *amici curiae*, by and through the attorneys of record and/or designated representatives for each party and *amicus curiae* in this original action. As permitted by order of the Special Master, and agreement among the parties, service was effected by electronic mail to those individuals listed on the attached service list, which reflects all updates and revisions through the current date.

Respectfully submitted,


Yolanda De La Cruz

Dated: October 10, 2021

SERVICE LIST FOR ALL PARTIES AND AMICI CURIAE

SPECIAL MASTER

Special Master	Honorable Michael J. Melloy <i>Special Master</i> United States Circuit Judge 111 Seventh Avenue, S.E. Box 22 Cedar Rapids, IA 52401 Michael E. Gans, Clerk of 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 (319) 432-6080 TXvNM141@ca8.uscourts.gov (314) 244-2400
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 (Service via Electronic Mail)

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¹ (*) = *Counsel of Record*

In the Supreme Court of the United States, Original No. 141
State of Texas v. State of New Mexico and State of Colorado

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In the Supreme Court of the United States, Original No. 141
State of Texas v. State of New Mexico and State of Colorado

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In the Supreme Court of the United States, Original No. 141
State of Texas v. State of New Mexico and State of Colorado

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In the Supreme Court of the United States, Original No. 141
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<p>Hudspeth County Conservation and Reclamation District No. 1</p>	<p>ANDREW S. "DREW" MILLER* KEMP SMITH LLP 919 Congress Ave., Suite 1305 Austin, TX 78701</p>	<p>dmiller@kempsmith.com (512) 320-5466</p>
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In the Supreme Court of the United States, Original No. 141
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<p>New Mexico State University</p>	<p>JOHN W. UTTON* UTTON & KERY, P.A. P.O. Box 2386 Santa Fe, NM 87504</p> <p>General Counsel Hadley Hall Room 132 2850 Weddell Road Las Cruces, NM 88003</p>	<p>john@uttonkery.com (505) 699-1445</p> <p>gencounsel@nmsu.edu (575) 646-2446</p>
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ATTACHMENT 1

Texas and United States Jesus Reyes Direct Testimony

Exhibit No.	Bates Begin	Bates End	Date	Exhibit Description	Category A, B, C	Category B Objections (Cite Fed. R. Evid.)	Category C Objections (Cite Fed. R. Evid.)	Offered	Admit (A) Not Admit (NA)
Reyes, Jesus_Demo_01			17-Jun	Irrigation Leader award—June 2017	A				
Reyes, Jesus_Demo_02			20-Jan	Irrigation Leader award—January 2020	A				
Reyes, Jesus_Demo_03			8/11/2021	El Paso County Water Improvement District No. 1 Organizational Chart as of August 11, 2021	A				
Reyes, Jesus_Demo_04				EPCWID1_Units_Map	A				
Reyes, Jesus_Demo_05				Picture of Riverside Canal immediately upstream from the Partidor Check Structure, facing Bustamante Wastewater Treatment Plant.	A				
Reyes, Jesus_Demo_06				Picture of Riverside Canal downstream from Riverside Wasteway #1.	A				
Reyes, Jesus_Demo_07				Picture of Hansen Lateral in the Lower Valley south of Fabens.	A				
Reyes, Jesus_Demo_08				Picture of Riverside Canal at the Stallings Check.	A				
Reyes, Jesus_Demo_09				Picture of Montoya Lateral and Ysla Lateral Project.	A				
JT-0426	JT-0426-0001	JT-0426-0002	2/16/1938	1938 Downstream Contract	ADMITTED				Admitted
US-458	US-0458_0001	US-0458_0014	11/10/1937	Contract between the United States and the El Paso County Water Improvement District No. 1 Adjusting Construction Charges and for Other Purposes (1937)	ADMITTED				Admitted
US-512	US-0512_0001	US-0512_0022	3/14/1980	Contract between the US and EPCWID No.1 transfer of the Operation and Maintenance of Project Works dated March 14, 1980	ADMITTED				Admitted

ATTACHMENT 2

Texas's Reyes Objections to New Mexico's Cross Testimony Exhibits

Trial Exhibit No.	ProdBeg	ProdEnd	Date	Subject/Title	Category (A, B, C)	Category B Objections (Cite Fed. R. Evid.)	Category C Objections (Cite Fed. R. Evid.)	Notes	Offer	Admit (A) Not Admit (NA)
JT-0436	NM_00132758	NM_00132765	3/7/2007	TCEQ Certificate of Adjudication No. 23-5940 (of US water rights)	B, C	TX Objects - Relevance, Confusion, Waste of Time (Fed. R. Evid. 401, 403)	TX Objects - Foundation (Fed. R. Evid. 602)			
JT-0449	Reyes2-DepoEX0019_00001	Reyes2-DepoEX0019_00007	2/19/2010	Agreement for the Sale of Sewage Effluent for Irrigation between Hudspeth County Conservation and Reclamation District No. 1 and the El Paso County Water Improvement District No. 1	A					
JT-0461	US0538670	US0538670	5/3/2012	River pumpers	B	TX Objects - Relevance, Confusion, Waste of Time (Fed. R. Evid. 401, 403)				
JT-0426	NM_00063486	NM_00063487	2/16/1938	1938 Downstream Contract	See note			ADMITTED		
JT-0441	NM_00292947	NM_00292955	3/14/2008	Re: Section 729 Salinity Management feasibility Study in the Upper Rio Grande	C		TX Objects - Foundation (Fed. R. Evid. 602)			
NM-0491	NM_00098678	NM_00098849	7/9/1998	Water Operations Department Operations Guide	B,C	TX Objects - Relevance (Fed. R. Evid. 401)	TX Objects - Foundation (Fed. R. Evid. 602)			
NM-2373	US0384146	US0384168	3/10/2008	2008 Operating Agreement for the Rio Grande Project	See note			ADMITTED		
NM-0200	EPCWID_074649	EPCWID_074778	1/11/2013	Notice and Agenda of Open and Closed Meetings of El Paso County Water Improvement District No. 1	B	TX Objects - Relevance, Confusion, Waste of Time (Fed. R. Evid. 401, 403)				
NM-2243	TX_00595675	TX_00595698	2/12/2018	Application for Agricultural Water Conservation Grant from the TWDB	A					
NM-2046	Reyes2-DepoEX0002_00001	Reyes2-DepoEX0002_00004	10/1/2008	Lower Rio Grande Project Operating Agreement: Settlement of Litigation dated October 2008	B	TX Objects - Hearsay (Fed. R. Evid. 802)				
NM-2280	US0138136	US0138144	2/5/2009	2009 Rio Grande Project Water Supply Initial Allocation	B,C	TX Objects - Hearsay (Fed. R. Evid. 802)	TX Objects - Foundation (Fed. R. Evid. 602)			
NM-2284	US0154285	US0154296	9/12/2005	Final Allocation of 2005 Rio Grande Project Water Supply Based on End of August Data	B,C	TX Objects - Hearsay (Fed. R. Evid. 802)	TX Objects - Foundation (Fed. R. Evid. 602)			
NM-2464	US0599457	US0599474	4/11/2018	Rio Grande Project - Operations Manual, Recommendation of Changes on 03/13/2018	See note			ADMITTED		
NM-0201	EPCWID_138732	EPCWID_138733	1/14/2015	Revised Final Charges for 2014 under the 2001 Implementing Contract	A					
NM-2287; US-0077; TX_0088	US0167400	US0167425	2/18/1941	Contract between the US, City of El Paso and EPCWID to Supply Water to the City of El Paso for Municipal Purposes	A					
NM-0427	NM_00018033	NM_00018052	12/20/1962	Contract Permitting City of El Paso to Acquire Additional Water Supply for Municipal Purposes between USA and the City of El Paso	A					
NM-0087	EBID_NM_000743-0001	EBID_NM_000743-0056	11/29/1988	Contract Regarding Delivery of Water to the El Paso County Lower Valley Water District Authority	A					
NM-0639	NM_00253821	NM_00253832	6/20/2006	Letter attaching "A Simplified Method for Allocation of Rio Grande Project Water Stored in Elephant Butte and Caballo Reservoirs"	A					

Texas's Reyes Objections to New Mexico's Cross Testimony Exhibits

NM-0226	EPWU000238452	EPWU000238457	8/10/1949	Contract between the City of El Paso and EPCWID	A				
NM-0818	NM_00469183	NM_00469697	1/1/2021	2021-Far-West-Texas-Water-Plan	B, C	TX Objects - Hearsay (Fed. R. Evid. 802), Relevance (Fed. R. Evid. 401)	TX Objects - Foundation (Fed. R. Evid. 602)		
NM-1778	NM2_00048810	NM2_00049439	1/1/2011	Far West Texas Water Plan prepared for the TWDB	C		TX Objects - Foundation (Fed. R. Evid. 602)		
NM-0113	EBID_NM_002316-0001	EBID_NM_002316-0066	12/2/1999	EPCWID WATER GUIDE 2000	B,C	TX Objects - Relevance (Fed. R. Evid. 401)	TX Objects - Foundation (Fed. R. Evid. 602)		
NM-0032	Chavez-DepoEX0008_00001	Chavez-DepoEX0008_00005	11/14/2001	Agreement for the Sale of Sewage Effluent for Irrigation between Hudspeth County Conservation and Reclamation District No. 1 and EPCWID dated 10/17/01	C		TX Objects - Foundation (Fed. R. Evid. 602)		
NM-0193	EPCWID_053503	EPCWID_053560	1/28/1998	EPCWID Board meeting minutes Jan 1998	C		TX Objects - Foundation (Fed. R. Evid. 602)		
NM-2058	Rios-DepoEX0005_00001	Rios-DepoEX0005_00001	1/1/2020	Small Tract Irrigation Schedule for 2020	B	TX Objects - Relevance (Fed. R. Evid. 401)			
NM-2461	US0595045	US0595048	3/27/2016	Email thread RE: First Release	B	TX Objects - Relevance (Fed. R. Evid. 401)			
NM-2235	TX_00565670	TX_00565740	6/1/2009	Evaluation of Irrigation Efficiency Strategies for Far West Texas: Feasibility, Water Savings And Cost Considerations	B,C	TX Objects - Relevance (Fed. R. Evid. 401)	TX Objects - Foundation (Fed. R. Evid. 602)		
NM-2048	Reyes2-DepoEX0017_00001	Reyes2-DepoEX0017_00021	10/9/2003	Letter: PSB Accounts caught irrigating during the 2003 irrigation season	B	TX Objects - Relevance (Fed. R. Evid. 401)			
NM-2060	Rios-DepoEX0009_00001	Rios-DepoEX0009_00005	3/12/2008	Email: Order Schedule	C		TX Objects - Foundation (Fed. R. Evid. 602)		
NM-2047	Reyes2-DepoEX0007_00001	Reyes2-DepoEX0007_00007	8/4/2005	Rio Grande Citizens Forum, August 4th, 2005, El Paso, Texas Tentative Meeting Notes (undated)	C		TX Objects to Authenticity (Fed. R. Evid. 901); Foundation (Fed. R. Evid. 602)		
NM-2330	US0237833	US0237835	6/16/2006	Operational Issues	B	TX Objects - Hearsay (Fed. R. Evid. 802); Relevance, Confusion, Waste of Time (Fed. R. Evid. 401, 403)			
NM-2049	Reyes-DepoEX0004_00001	Reyes-DepoEX0004_00001		Procedure for Ordering Water by Farm Tract Water Users	C		TX Objects to Authenticity (Fed. R. Evid. 901)		
NM-0630	NM_00251644	NM_00251646	10/5/2007	SUBJECT: Request for Confirmation of Irrigation Orders for January 2008 (Rio Grande Project)	A				
NM-0202	EPCWID_138734	EPCWID_138735	1/23/2018	Final Charges for 2017 under the 2001 Implementing Contract	C		TX Objects - Foundation (Fed. R. Evid. 602)		
NM-2269A			4/9/2008	Letter from Reyes to EP# 1 Employees RE: Allocation Increase	B	TX Objects - Relevance (Fed. R. Evid. 401)			
NM-0535	NM_00136595	NM_00136653	5/30/2014	Power Point Presentation: "El Paso County Water Improvement District #1"	B	TX Objects - Hearsay (Fed. R. Evid. 802), Relevance (Fed. R. Evid. 401)			
NM-0826	NM_00470039	NM_00470043	4/7/2021	EBID and EPCWID complaints re 2020 EA report	B	TX Objects - Relevance, Confusion, Waste of Time (Fed. R. Evid. 401, 403)			
NM-0196	EPCWID_063833	EPCWID_063838	3/10/1993	Memorandum of Understanding between Hudspeth and EPCWID	B	TX Objects - Relevance, Confusion, Waste of Time (Fed. R. Evid. 401, 403)			

Texas's Reyes Objections to New Mexico's Cross Testimony Exhibits

NM-2358	US0314059	US0314102		Contract Among the City of El Paso, its Public Service Board, and the El Paso County Lower Valley Water District Authority providing for Water and Swage Treatment	A				
			1/17/1989						
TX-0277	TX_DEPO-EX_00089412	TX_DEPO-EX_00089447		Reyes, Jesus Exhibit from Virtual Deposition Testimony, Vol. 1JR EXHIBIT NO. 16: Interoffice Memorandum dated January 15, 2014	B	TX Objects - Hearsay (Fed. R. Evid. 802)			
			8/31/2020						
TX-0279	TX_DEPO-EX_00089469	TX_DEPO-EX_00089473		Reyes, Jesus Exhibit from Vritual Deposition Testimony, Vol. 1 JR EXHIBIT NO. 18: Interlocal Agreement for Water Supply	A				
			8/31/2020						
TX-0084	TX_DEPO-EX_00004914	TX_DEPO-EX_00004927		Balliew, John Exhibit from Deposition Testimony, Vol. 1 (9/12/2019) EXHIBIT NO. 13: Contract for the Conversion of Rio Grande Project Water from Irrigation to Miscellaneous Purposes and Uses Other Than Irrigation dated March 19, 1998	See note			ADMITTED.	
			3/19/1998						
TX-0287	TX_DEPO-EX_00089765	TX_DEPO-EX_00089765		Flow Data Collection Sites Checklist	C		NM Objects - Authenticity (Fed. R. Evid. 901); TX Objects - Foundation (Fed. R. Evid. 602)		
US-0116	US0808519	US0808598		Resolution authorizing the Mayor to sign the Rio Grande Project Implementing Third-Party Contract among the US, EPWID No.1 and City of El Paso for conversion of Rio Grande Project Water to Municipal Use	A				
			2/6/2001						
US-0066	US0823247	US0823283		PPT Water Conservation and Management Projects in El Paso County Water Improvement District	B	TX Objects - Hearsay (Fed. R. Evid. 802)			
US-0067	US0823431	US0823444		Contract between BOR and EPCWID No.1 for the Conversion of RGP Water	See note			ADMITTED	
			3/18/1998						
US-0547	US0544879	US0544879		Allocation Committee Designation 2016	See note			ADMITTED	
			3/29/2016						
NM-DEMO-001				Google Earth Demonstrative	See note			ADMITTED	
NM-DEMO-002				LRG Basin Tour	See note			ADMITTED	
			9/28/2021						
NM-DEMO-003				Comparison of District Allotment Data 2008-2020	See note			ADMITTED	
NM-DEMO-018				Photographs of Franklin Feeder and Franklin Canal	A				
NM-0195	EPCWID_057239	EPCWID_057245		Minutes of Special Meeting of Board of Directors of EPCWID	C		TX Objects - Foundation (Fed. R. Evid. 602)		
			8/15/2007						
NM-0287				Minutes of Regular Meeting Board of Directors of El Paso County Water Improvement District No. 1 (the "District") dated July 11, 2007	B	TX Objects - Relevance, Confusion, Waste of Time (Fed. R. Evid. 401, 403)			
			7/11/2007						