

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 NOTICE OF EXHIBIT
DISCLOSURES AND OBJECTIONS FOR
LARRY FRENCH**

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November 4, 2021

In response to the Special Master's September 16, 2021 Order Regarding Remote Trial Protocols, the State of New Mexico provides the following exhibit disclosures and objections for Larry French. As of this filing, the parties anticipate that Mr. French will testify on November 4 or 5, 2021. Accordingly, the State of New Mexico provides the following:

Attachment 1: The Larry French direct-examination exhibit index, which identifies the States of Texas's and the United States of America's objections.

Attachment 2: The Larry French cross-examination exhibit index, which identifies the State of New Mexico's objections. Note that there are no objections to these exhibits.

All exhibits, indexes, and related exhibits have been uploaded to Box.com and are available for the parties to access and download.

Dated: November 4, 2021

Respectfully submitted,

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

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STATE OF NEW MEXICO'S CERTIFICATE OF SERVICE

This is to certify that on this 4th day of November, 2021, I caused a true and correct copy of **THE STATE OF NEW MEXICO'S NOTICE OF EXHIBIT DISCLOSURES AND OBJECTIONS FOR LARRY FRENCH** 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,

Dated: November 4, 2021

/s/ Michael A. Kopp

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Special Master

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Texas and United States Objections to New Mexico Direct Examination Exhibits for Larry French

Trialexno	ProdBeg	ProdEnd	Date	Subject/Title	Category (A, B, C)	Category B Objections	Category C Objections
NM-0348	Mills-DepoEX0004_00001	Mills-DepoEX0004_00001	11/1/2019	Texas Priority Groundwater Management Areas (PGMAs) (undated)	A		
NM-0818	NM_00469183	NM_00469697	1/1/2021	2021-Far-West-Texas-Water-Plan	Admitted		
NM-0859	NM_00471612	NM_00471612	12/15/2020	Groundwater Management Areas - TX map	A		
NM-0860	NM_00471613	NM_00471613	8/1/2020	Texas Groundwater Conservation Districts	A		
NM-0861	NM_00471614	NM_00471614	12/15/2020	Groundwater Conservation Districts - Map of Texas	A		
NM-1672	NM2_00041043	NM2_00041075	3/1/1990	Evaluation of Ground-Water Resources in El Paso County, Texas	Admitted		
NM-2111	TX_00054095	TX_00054617	1/1/2001	Far West Texas Regional Water Plan	A		
NM-2166	TX_00284426	TX_00284535	1/1/1999	Priority Groundwater Management Areas and Groundwater Conservation Districts; Report to the 76th Legislature	A		
NM-2240	TX_00581114	TX_00581295	7/1/2011	Aquifers of Texas, Report 380 to Texas Water Development Board	A		
NM-DEMO-036	NM-DEMO-036	NM-DEMO-036		Major & Minor Aquifers of TX	A		
NM-DEMO-041	NM-DEMO-041	NM-DEMO-041		Joint Regional GW Planning	A		
NM-DEMO-042	NM-DEMO-042	NM-DEMO-042		TWDB GCD	A		
NM-DEMO-043	NM-DEMO-043	NM-DEMO-043		Groundwater Management Areas - Overview and FAQs	C		TX & US Object - Foundation (Fed. R. Evid. 602)
NM-DEMO-044	NM-DEMO-044	NM-DEMO-044		Hueco-Mesilla Bolsons Aquifer	A		
NM-DEMO-046	NM-DEMO-046	NM-DEMO-046		USGS Current Conditions for USGS 315712106361803 MBOWN-238 - JL-49-04-476 (CWF-2C)	C		TX & US Object - Foundation (Fed. R. Evid. 602)
NM-DEMO-047	NM-DEMO-047	NM-DEMO-047		USGS Groundwater for Texas_ Water Levels -- 4913301	C		TX & US Object - Foundation (Fed. R. Evid. 602)
NM-DEMO-048	NM-DEMO-048	NM-DEMO-048		Water Data For Texas well 4904476 on 11-3-2021	C		TX & US Object - Foundation (Fed. R. Evid. 602)
NM-DEMO-049	NM-DEMO-049	NM-DEMO-049		Water Data For Texas well 4913301 on 11-3-2021	C		TX & US Object - Foundation (Fed. R. Evid. 602)
NM-DEMO-050	NM-DEMO-050	NM-DEMO-050		TWDB Groundwater Models	C		TX & US Object - Foundation (Fed. R. Evid. 602)
NM-DEMO-051	NM-DEMO-051	NM-DEMO-051		Water_Levels_TWDB data	C		TX & US Object - Foundation (Fed. R. Evid. 602)

New Mexico Objections to TX and US Cross Examination Exhibits for Larry French

Trialexno	ProdBeg	ProdEnd	Date	Subject/Title	Category	Category B Objections	Category C Objections
TX-DEMO-FRENCH			11/1/2021	TX/US - Larry French Demonstratives	A		