

STATE OF NEW MEXICO
SAN JUAN COUNTY
THE ELEVENTH JUDICIAL DISTRICT COURT

DISTRICT COURT
SAN JUAN COUNTY NM
FILED
2013 FEB -4 AM 10: 50

STATE OF NEW MEXICO, *ex rel.* STATE ENGINEER,

CV-75-184

Plaintiff,

HON. JAMES J. WECHSLER
Presiding Judge

vs.

THE UNITED STATES OF AMERICA, *et al.*,

SAN JUAN RIVER
GENERAL STREAM
ADJUDICATION

Defendants,

THE JICARILLA APACHE TRIBE AND THE
NAVAJO NATION,

Claims of the Navajo Nation

Defendant-Intervenors.

Case No. AB-07-1

NAME OF PARTY: United States of America

DESCRIPTIVE SUMMARY: Supplemental disclosures concerning addendum to the expert report of Mr. Travis Greenwalt – Addendum A and B to the report and this supplemental disclosure.

NUMBER OF PAGES: 2 (not including Addendum A and B to this disclosure)

DATE OF FILING (by mail): January 31, 2013

THE UNITED STATES' SUPPLEMENTAL DISCLOSURES

This pleading serves as a supplemental disclosure to the *United States' Initial Disclosures* (April 2, 2012) (U.S. Initial Disclosures) as well as a supplemental response to any relevant discovery request previously issued to the United States in this sub-file proceeding. This constitutes the United States' Fourth Supplemental Disclosure.

Introduction

On February 2, 2012, the United States provided the Court and all parties the *Technical Reports Supporting the United States' Statement of Claims of Water Rights in the New Mexico San Juan River Basin on Behalf of the Navajo Nation and Disclosures of Individuals with*

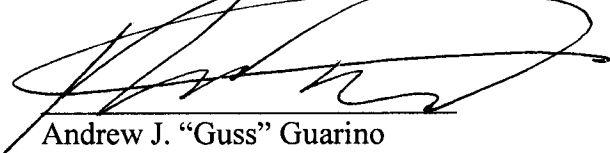
Information Concerning Such Technical Reports (U.S. Technical Reports). These technical reports outlined the extensive factual basis for the more detailed statement of claims that the Court ordered the United States to previously prepare. *See United States' Statement of Claims of Water Rights in the New Mexico San Juan River Basin on Behalf of the Navajo Nation* (January 3, 2011) (U.S. Statement of Claims). Subsequently, the United States provided non-settling parties its initial disclosures. *See U.S. Initial Disclosures*. In its initial disclosures, the United States identified persons it may use to support the Settlement Motion and who may likely have discoverable information. U.S. Initial Disclosures § I. The United States also identified the documents that the United States may rely upon to support the Settlement Motion. U.S. Initial Disclosures § II.A. Each person and document identified were well-known to all non-settling parties as they were previously identified by the United States. *See e.g.* U.S. Technical Reports.

Supplemental Disclosure and Responses

Mr. Travis Greenwalt of CardnoEntrix has recently prepared two addendum to his previously disclosed report *Future Large Industrial Water Claims on Navajo Nation in the San Juan River Basin*. *See U.S. Technical Reports Attachment D*. These addendum are attached to this disclosure as Addendum A and B. In the event that an issue of fact arises at any time in conjunction with the Navajo *Inter Se* for which information contained in Attachments A and B is needed, the United States will present such information as needed.

Respectfully submitted this 31st day of December, 2013.

UNITED STATES OF AMERICA

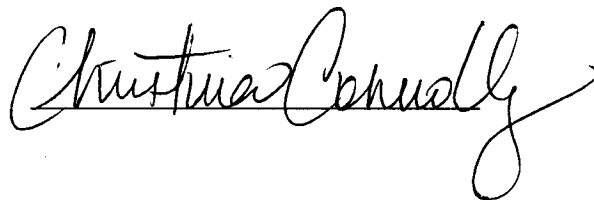


Andrew J. "Guss" Guarino
U.S. Department of Justice
Environment and Natural Resources Division
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Denver, CO 80202
(303) 844-1343

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January 2013, a true and accurate copy of **THE UNITED STATES' SUPPLEMENTAL DISCLOSURES** was served by attaching an electronic copy to an email sent to the following address, wrnavajointerse@nmcourts.gov, and to those e-mail addresses identified in the *ORDER SUMMARIZING DISCOVERY ACTIVITIES DISCUSSED AT THE NOVEMBR 6, 2012 DISCOVERY CONFERENCE* (November 16, 2012).

A handwritten signature in black ink, reading "Christina Connelly". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Data Manager Memorandum

The United States' Supplemental Disclosures, filed February 4, 2013 in case number AB-070000001, has two attachments, Addendum A and Addendum B. These Addenda are too large to scan into ApplicationXtender. They are located only in the hard-copy court record.