

DISTRICT COURT  
SAN JUAN COUNTY NM  
FILED  
2013 FEB 11 PM 1:01

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

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

Plaintiff,

vs.

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

Defendants.

AB-07-1

Claims of Navajo Nation

No. CV 75-184

Honorable James J. Wechsler

Presiding Judge

DESCRIPTIVE SUMMARY: Request for admission and stipulation  
on water units of measurement for use by the court and the parties.  
  
NUMBER OF PAGES: 3  
  
DATE OF FILING: February 11, 2013

REQUEST FOR ADMISSION AND STIPULATION  
ABOUT WATER UNITS OF MEASUREMENT

Pursuant to Rule 1-036, the Community Ditch Defendant-counterclaimants and other cooperating defendants submit the following requests for admission to each of the following parties: the Navajo Nation, the United States, and the State of New Mexico:

Request for Admission Number 1: Admit that the water units of measurement shown on the attached page are correct.

Response:

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**Request for Admission Number 2:** Admit that the water units of measurement shown on the attached page can be used by the court and all parties during proceedings in this case.

**Response:**

The United States, the Navajo Nation, and the State of New Mexico are hereby requested to enter into a formal stipulation for the use of these water units of measurement. All parties are requested to suggest other units of water measurement that would be useful to the court and the parties.

Respectfully submitted,

VICTOR R. MARSHALL & ASSOCIATES, P.C.

By /s/ Victor R. Marshall

Victor R. Marshall  
Attorneys for San Juan Agricultural Water Users  
Association; Hammond Conservancy District;  
Bloomfield Irrigation District; various ditches; and  
various members thereof.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of February, 2013, a true and correct copy of the foregoing was served on the parties and claimants by attaching a copy of said document to an email sent to the following list server: [wrvnavajointerse@nmcourts.gov](mailto:wrvnavajointerse@nmcourts.gov) and to the filing list referred to in paragraph 8 of the court's November 19, 2012 Corrected Order.

/s/ Victor R. Marshall  
Victor R. Marshall, Esq.

## WATER UNITS OF MEASUREMENT

- A. 1 cubic foot of water = 7.48 U.S. fluid gallon  
       = 62.3 pounds (varies slightly depending on pressure,  
 temperature, etc.)
- B. 1 acre = 43,560 square feet
- C. 1 acre-foot of water = 43,560 cubic feet of water (enough water to cover 1 acre to a  
 depth of 1 foot)  
       = 325,829 gallons  
       = 2,713,788 pounds
- D. 1 cubic foot per second = 60 cubic feet per minute = 3,600 cubic feet per hour  
       = 86,400 cubic feet per day = 1.983 acre-feet per day
- E. 1 year = 365.25 days = 31,557,600 seconds (A common "year" unit in scientific  
 practice is a year of exactly 365.25 days, based on a day of exactly 86,400 seconds.)
- F. 1 cfs per year = 724.46 acre-feet per year  
       = 31,557,600 cubic feet per year = 236,050,848 gallons per year
- G. Miner's inch – unit of flow per unit of time
- 1/50 cubic foot per second (566 milliliters per second) in southern California, Idaho,  
 Kansas, Nebraska, New Mexico, North Dakota, South Dakota, Utah, Washington.  
 1/40 cubic foot per second (708 milliliters per second) in Arizona, northern California,  
 Montana, Nevada, Oregon.  
 1/38 cubic foot per second (745 milliliters per second) in Colorado.