UNITED STATES DISTRICT COURT DISTRICT OF NEW MEXICO

UNITED STATES,

Plaintiff,

vs.

NO. CIV-01-0072 BB/WWD

STATE OF NEW MEXICO ENGINEER, et al.,

Defendants.

OBJECTION BY DEFENDANT PAUL PETRANTO TO PROPOSED BOUNDARY OF THE ZUNI RIVER STREAM SYSTEM

Defendant Paul Petranto, by and through his defense counsel, William G. Stripp, hereby objects to the proposed boundary of the Zuni River Stream System as put forth in the document entitled <u>Identification of Zuni River Stream System Boundary</u>, filed by the United States on January 6, 2003. The document does not state how the proposed boundary of the stream system was established. Defense counsel believes that there is evidence that the proposed boundary of the stream system might encompass two or more separate stream systems. Defense counsel would like the opportunity to present evidence and argument that the proposed boundary of the stream system is overbroad.

Date: January 13, 2003 Respectfully submitted,

----signed electronically-----

WILLIAM G. STRIPP ATTORNEY AT LAW P.O. BOX 159 RAMAH, NEW MEXICO 87321

Telephone: (505) 783-4138 Facsimile: (505) 783-4139

CERTIFICATE OF MAILING

This is to certify that on January 13, 2003 this pleading was served on the following individuals by placing it into envelopes with postage prepaid and addressed as follows:

Mark K. Adams

Attorney at Law Rodey, Dickason, Sloan, Akin & Robb P.O. Box 1357

Santa Fe, NM 87504-1357

Randolph H. Barnhouse

Attorney at Law Rosebrough & Barnhouse, P.C.

P.O. Box 1744

Gallup, NM 87305

Larry D. Beall

Attorney at Law Beall & Biehler, P.A.

6715 Academy Road NE

Albuquerque, NM 87109

Ann Hambleton Beardsley

HC 61, Box 747 Ramah, NM 87321 Quivira Mining Company

Delbert & Mary Beal W.A. & Janet Fay Scott

William Goldsmith

Joseph A. Solis Barbara L. Solis

Pro Se

Bruce Boynton III

Attorney at Law Boynton & Sims-West P.O. Box 1239 Grants, NM 87020

Pitchford Properties

Ted Broderick

P.O. Box 219

Ramah, New Mexico 87321

Pro Se

Steven L. Bunch

Attorney at Law New Mexico Highway & Transportation Dept. P.O. Box 1149 Santa Fe, NM 87504-1149

State of New Mexico

Darcy Bushnell

Attorney at Law **US District Court** 3333 Lomas Blvd NW Albuquerque, NM 87102-2272

David Candelaria Pro Se

12000 Ice Caves Road Grants, NM 87020

Ernest L. Carroll John A. Yates

Attorney at Law Losee, Carson, Haas & Carroll, PA P.O. Box 1720 Artesia, NM 88211-1720

Peter B. Shoenfeld John A. Yates

Attorney at Law P.O. Box 2421

Santa Fe, NM 87504-2421

Kenneth J. Cassutt

Attorney at Law Cassutt, Hays & Friedman, PA 530-B Harkle Rd. Santa Fe, NM 87505

Timberlake Ranch

Jeffrey A. Dahl

Attorney at Law Lamb, Metzgar, Lines & Dahl, PA P.O. Box 987 Albuquerque, NM 87103-0987

Alan F. & Christine B. Davis

Tessa T. Davidson

Attorney at Law Swaim, Schrandt & Davidson, P.C. 4830 Juan Tabo N.E., Suite F Albuquerque, NM 87111

Homer G. & Julienne A. Pringle

Louis E. DePauli, Sr.

1610 Redrock Drive Gallup, NM 87301 Pro Se

Sandra S. Drullinger

818 E. Maple Street Hoopeston, IL 60942 Pro Se

Charles T. Dumars Christina Bruff DuMars

Jeffrie Minier Attorneys at Law 201 Third Street NW, 13th Floor, #1370 Albuquerque, NM 87102 Richard Davis Mallery

R. Bruce Frederick Stephen G. Hughes

Special Assistant Attorneys General New Mexico State Land Office P.O. Box 1148 Santa Fe, NM 87504-1148 **Public Lands Commissioner**

Vickie L. Gabin, Esq.

US District Court US Courthouse P.O. Box 2384 Santa Fe, NM 87504-2384 **Special Master**

David R. Gardner

Attorney at Law P.O. Box 62 Bernalillo, NM 87004-0062 Alberta O'Neal

David Gehlert

US Department of Justice 999 18th Street, #945 Denver, CO 80202 US Department of Justice

Kimberly J. Gugliotta

158 W William Casey Street Corona, AZ 85641

Pro Se

Raymond Hamilton

Attorney at Law US Attorney's Office P.O. Box 607 Albuquerque, NM 87103-0607 **United States**

Robert W. Ionta

Attorney at Law P.O. Box 1059 Gallup, NM 87305 Pro Se Linda Ionta

Mary Ann Joca

General Counsel US Department of Agriculture P.O. Box 586 Albuquerque, NM 87103 **US** Department of Agriculture

Albert O. Lebeck, Jr.

Attorney at Law P.O. Box 38 Gallup, NM 87305 Pro Se David R. Lebeck

Patricia A. Madrid

Attorney General P.O. Box 1508 Santa Fe, NM 87504-1508

Zuni Indian Tribe

Jane Marx

Attorney at Law Jane Marx, Attorney at Law, P.C. 3800 Rio Grande Blvd. N.W., PMB 167 Albuquerque, NM 87107

Gerald F. & Myrrl W. McBride

2725 Aliso Drive NE Albuquerque, NM 87110 Pro Se

Clara M. Mercer

1017 S 10th Ave Yuma, AZ 85364 Pro Se

Stephen R. Nelson

Attorney at Law Johnson & Nelson, PC P.O. Box 25547 Albuquerque, NM 87125-5547 April E. Crosby

Sunny J. Nixon

Attorney at Law Rodey, Dickason, Sloan, Akin & Robb P.O. Box 1357 Santa Fe, NM 87504-1357 Tri-State Generation & Transmission Assoc., Inc.

Charles E. O'Connell Jr.

Attorney at Law U.S. Department of Justice Environment & Natural Resources P.O. Box 44378 Washington D.C., DC 20026-4378 **United States**

Stanley Pollock

Attorney at Law Navajo Nation Dept. of Justice P.O. Drawer 2010 Window Rock, AZ 86515 Navajo Nation

Dorothy Sanchez

Attorney at Law 715 Tijeras N.W. Albuquerque, NM 87102 Jerry R. & Emily S. Frazier

D.L. Sanders

Edward C. Bagley
Attorneys at Law
New Mexico State Engineer's Office
PO Box 25102
Santa Fe, NM 87504-5102

State Engineer

Mark H. Shaw

Attorney at Law 3733 Eubank NE Albuquerque, NM 87111 Paul Bernett

Mark A. Smith

Jocelyn C. Drennan Tom Outler

Tom Outler
Attorneys at Law
Rodey, Dickason, Sloan, Akin & Robb, P.A.
P.O. Box 1888
Albuquerque, NM 87103

Salt River Project

John B. Weldon Jr.
M. Byron Lewis
Mark A. McGinnis
Attorneys at Law
Salmon, Lewis & Weldon
4444 N. 32nd Street, Suite 200
Phoenix, AZ 85032

Salt River Project

and then placing the envelopes with the United States Post Office in Ramah, New Mexico for mailing.

----signed electronically-----

WILLIAM G. STRIPP

WILLIAM G. STRIPP
ATTORNEY FOR DEFENDANT PAUL PETRANTO