IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

and)
STATE OF NEW MEXICO, ex rel. STATE	
ENGINEER,	
Plaintiffs,)
	No. 01cv00072 BB-ACE
and	
	ZUNI RIVER BASIN
ZUNI INDIAN TRIBE, NAVAJO NATION,) ADJUDICATION
Plaintiffs in Intervention,	Sub-areas 4 & 8
V.	Subfiles ZRB-1-0064, 1-0115, 1
	0147, and 1-0148
A&R PRODUCTIONS, et al.	
Defendants.))
)

MOTION TO EXTEND CONSULTATION PERIOD AND ANSWER DATE

The Plaintiffs United States of America ("United States") and State of New Mexico ex rel. State Engineer ("State") hereby move the Special Master to allow additional time for consultations concerning Subfiles ZRB-1-0064, 1-0115, 1-0147, and 1-0148, by extending the Defendants' deadline for filing a form Subfile *Answer* in said subfiles to October 12, 2006. In support of this motion, the movants assert:

1. On April 5, 2006, counsel for Plaintiffs met with Defendant Walter Lee Meech and one of his attorneys of record, Bruce Boynton, for the purpose of consulting concerning the Consent Orders proposed for Subfiles ZRB-1-0064 and ZRB-1-0115. As a result of the consultation, the parties agreed that final resolution of these subfiles would be facilitated by the collection of several additional months of metering

data for wells involved in the subfiles and by additional field investigation concerning stock ponds and other water uses on the affected properties.

2. Also as a result of the April 5, 2006 consultation, and updated

information obtained from county records, it appears that two new subfiles, ZRB-1-0147,

involving Daniel Meech and Patricia Meech, and ZRB-1-0148, involving Walter V.

Meech Jr. and Norma M. Meech, need additional field survey work.

3. An extension of the Answer date applicable to Subfiles ZRB-1-

0064, 1-0115, 1-0147, and 1-0148 to October 12, 2006, a date approximately six months

from the date of this motion, will permit accumulation of a sufficient metering record, the

conduct of necessary field investigations, and the preparation and review of new or

revised Consent Order documents to conclude these subfiles.

4. During the consultation on April 5, 2006, counsel for the United

States and the State discussed the requested extension with Bruce Boynton, counsel for

Walter Lee Meech, C & E Concrete, Inc. and Meech-Cash, LLC. Tanya L. Scott, co-

counsel for Walter Lee Meech, concurs in this request.

Accordingly, the Plaintiffs respectfully move the Special Master to extend

the Answer date in Subfiles ZRB-1-0064, 1-0115, 1-0147, and 1-0148 to October 12,

2006.

DATED:

April 14, 2006

Respectfully submitted,

BRADLEYS. BRIDGEWATER U.S. Department of Justice 999 18th St., Suite 945 North

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COUNSEL FOR THE UNITED STATES

(approved via telephone 4/14/2006)
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COUNSEL FOR THE STATE OF NEW MEXICO EX REL. STATE ENGINEER

CERTIFICATE OF SERVICE

I hereby certify that, on April 14, 2006, a copy of the forgoing *Motion To*

Extend Consultation Period And Answer Date was mailed to the following persons.

Special Master Vickie L. Gabin U.S. District Court District of New Mexico P.O. Box 2384 Santa Fe, NM 87504-2384

Karla McCall, Data Manager 1315 Sagebrush Dr. S.W. Los Lunas, NM 87031

Edward Bagley Office of the State Engineer, Legal Division P.O. Box 25102 Santa Fe, NM 87504

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Bruce Boynton P.O. Box 1239 Grants, NM 87020