

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA	)	
and	)	No. 01cv00072-MV-WPL
STATE OF NEW MEXICO, ex rel. STATE	)	
ENGINEER,	)	ZUNI RIVER BASIN
Plaintiffs,	)	ADJUDICATION
v.	)	
	)	Subfile No. ZRB-5-0056
A & R PRODUCTIONS, et al.	)	
Defendants.	)	
_____	)	

**SUBFILE ANSWER**

**NOW ENTERING COURT** is William G. Stripp, Attorney at Law, on behalf of Defendant Ramah Water and Sanitation District, who answers the complaint as follows:

1. Defendant Ramah Water and Sanitation District objects to the description of water rights contained in the proposed Consent Order offered by the United States and the State of New Mexico concerning Subfile Number **ZRB-4-0056**.

2. The objection to the description of the water rights described by the proposed Consent Order for Subfile Number **ZRB-4-0056** is made because the offers do not accurately reflect either historical beneficial use or future needs. Furthermore, the offer made to the Ramah Domestic Utility Association in Subfile No. ZRB-5-0057 should have been made to the Ramah Water and Sanitation District which owns the water rights attributed to the Ramah Domestic Utility Association.

3. Defendant Ramah Water and Sanitation District is a political subdivision of the State of New Mexico pursuant to the Water and Sanitation District Act, NMSA, 1978, §§ 73-21-1 et seq. As such the district has all the powers of a public or quasi-municipal

corporation. Prior to the entry of appearance of counsel, Defendant believes that prior district officers had some form of meetings with Plaintiffs to make a good faith effort to resolve disagreements with the Consent Order proposed by the Plaintiffs. While Defendant believes that the current offer presented in the Consent Order is unacceptable, Defendant is willing to continue negotiations in an attempt to resolve the parties' differences.

4. Defendant understands that by making this claim and filing this document it is not waiving its right to later raise in an Amended Answer, any jurisdictional or affirmative defenses it may have.

5. Defense counsel is using a slightly modified version of the Subfile Answer form presented with the Notice That the Consultation Period Has Ended rather than a customized pleading, because it is appropriate in the circumstances.

Date: July 6, 2017

Respectfully submitted,

/s/ William G. Stripp  
**WILLIAM G. STRIPP**  
**ATTORNEY AT LAW**  
**P.O. BOX 159**  
**RAMAH, NEW MEXICO 87321**  
**Telephone: (505) 783-4138**  
**Facsimile: (505) 783-4139**

**Certificate of Service**

I HEREBY CERTIFY that on July 6, 2017, I filed the foregoing electronically through the CM/ECF system, which caused counsel and parties pro se who have entered an appearance to be served by electronic means.

/s/ William G. Stripp  
William G. Stripp  
Attorney at Law