Case 6:01-cv-00072-MV-JHR Document 3491-2 Filed 03/15/21 Page 1 of 9



COURT REPORTING

LEGAL VIDEOGRAPHY

VIDEOCONFERENCING

TRIAL PRESENTATION

MOCK JURY SERVICES

LEGAL TRANSCRIPTION

COPYING AND SCANNING

LANGUAGE INTERPRETERS







(800) 528-3335 NAEGELIUSA.COM

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

UNITED STATES OF AMERICA,

and

v.

STATE OF NEW MEXICO ex rel. STATE ENGINEER,

Plaintiffs,

No. 01cv00072-MV/JHR ZUNI RIVER BASIN ADJUDICATION Subfile No. ZRB-1-0148

A & R PRODUCTIONS, et al.,

Defendants.

REMOTE DEPOSITION BY VIDEOCONFERENCE

WALTER L. MEECH

TAKEN ON WEDNESDAY, FEBRUARY 3, 2021 1:09 P.M.

201 THIRD STREET NORTHWEST, SUITE 1750 ALBUQUERQUE, NEW MEXICO 87102

Exhibit 2 - Walter Meech Deposition Excerpts

Case 6:01-cv-00072-MV-JHR Document 3491-2 Filed 03/15/21 Page 2 of 9 Waiter Meech February 3, 2021 NDT Assgn # 36139-5 Page 7

22	24
1 Q. And where, generally speaking in Section	1 A. You you said 2003. This this was
2 4, is the third well located?	2 1988.
3 A. It's close to where the 8B-1-SP34 is, the	3 Q. Right. No, the well was drilled in 1988;
4 retention pond.	4 I understand that. But according to this document,
5 Q. Okay. And how long has that well been	5 you amended the the declaration of of right
6 there? When was that well drilled?	6 for this well in 2003. Does that sound familiar?
7 A. Twenty-five years ago.	7 A. Yes, sir.
8 Q. And is that well utilized in mining	8 Q. Okay. And as I understand the document,
9 operations? 10 A. It was it was used mostly to water	9 which does note that water that the well was10 drilled in October of 1988, as you stated, the
 10 A. It was it was used mostly to water 11 trees. There was a tree farm down there. 	11 amendment was filed to to note that the well uses
12 Q. Is that well currently operational?	12 90 percent well use is 90 percent rather than
13 A. Yes.	13 60 percent, which was what had been, as I understand
14 Q. Okay. Is the tree farm still there?	14 it, previously declared. Does that also sound
15 A. Yes.	15 familiar to you?
16 Q. The other two wells, G-336 and G-337, are	16 And I'm for the record, I'm I'm
17 they utilized in mining operations?	17 I'm referring to Paragraph 8 in that form, which is
18 A. Yes.	18 on page 3 of the material.
19 Q. Okay. Both of them are or just or	19 A. Okay. Yes.
20 or one or the other?	20 Q. Okay. And the well itself had gone on
A. Well, both of them were. The I believe	21 line back in 1988. Is that correct?
22 the G-336 hasn't been running for a while. We've	22 A. Yes.
23 had some issues with it.	23 Q. Okay. Now, you mentioned that that well
24 Q. Let's talk about 336. If I could direct	24 had some problems. What did you mean by that?
25 your attention to what's been marked Exhibit 3 for	25 A. We just we've had some issues with
23	25
23 1 identification.	
	 25 1 the with the well being able to pump with the 2 water. There was some they've done some work on
1 identification.	1 the with the well being able to pump with the
 identification. (WHEREUPON, Exhibit 3 was marked for 	 the with the well being able to pump with the water. There was some they've done some work on
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it.
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used?
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water?
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No.
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind,
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification.
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.)
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS:
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS: Q. This is another document from the New
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For Natural Persons," I take it you're the Walter L. 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS: Q. This is another document from the New Mexico Office of the State Engineer, another
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For Natural Persons," I take it you're the Walter L. 	 1 the with the well being able to pump with the 2 water. There was some they've done some work on 3 it and some of the driller did, there was some 4 problems with it. 5 Q. Okay. Is it currently being used? 6 A. It's it's not producing water right 7 now. No, sir. 8 Q. Okay. Are you able to say when it stopped 9 producing water? 10 A. No. 11 Q. Okay. Let me, if you wouldn't mind, 12 direct your attention to what's been marked Exhibit 13 4 for identification. 14 (WHEREUPON, Exhibit 4 was marked for 15 identification.) 16 BY MR. GOLLIS: 17 Q. This is another document from the New 18 Mexico Office of the State Engineer, another
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For Natural Persons," I take it you're the Walter L. Meech who acknowledged this document? Is that 	 1 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS: Q. This is another document from the New Mexico Office of the State Engineer, another Declaration of Owner of Underground Water Right.
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For Natural Persons," I take it you're the Walter L. Meech who acknowledged this document? Is that correct? 	 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS: Q. This is another document from the New Mexico Office of the State Engineer, another Declaration of Owner of Underground Water Right. This one is for Well G-337. Will you go ahead and
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For Natural Persons," I take it you're the Walter L. Meech who acknowledged this document? Is that correct? A. Yes. 	 1 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS: Q. This is another document from the New Mexico Office of the State Engineer, another Declaration of Owner of Underground Water Right. This one is for Well G-337. Will you go ahead and take a look at that for me if you wouldn't mind, and
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For Natural Persons," I take it you're the Walter L. Meech who acknowledged this document? Is that correct? A. Yes. Q. Okay. And does this does this document 	 1 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS: Q. This is another document from the New Mexico Office of the State Engineer, another Declaration of Owner of Underground Water Right. This one is for Well G-337. Will you go ahead and take a look at that for me if you wouldn't mind, and let me know when you're ready to proceed.
 identification. (WHEREUPON, Exhibit 3 was marked for identification.) BY MR. GOLLIS: Q. It is four-page document. And if you wouldn't mind to take the time, take a look at that, familiarize yourself with it and then we'll discuss that a little bit. A. Okay. Q. Do you recall when Well G-336 was was drilled? A. October 1988. Q. Okay. And you were employed by C & E Concrete at that time? A. Yes. Q. Okay. And if you look at the last page of Exhibit 3, which contains an "Acknowledgment For Natural Persons," I take it you're the Walter L. Meech who acknowledged this document? Is that correct? A. Yes. Q. Okay. And does this does this document look to you like the declaration of owner of 	 1 the with the well being able to pump with the water. There was some they've done some work on it and some of the driller did, there was some problems with it. Q. Okay. Is it currently being used? A. It's it's not producing water right now. No, sir. Q. Okay. Are you able to say when it stopped producing water? A. No. Q. Okay. Let me, if you wouldn't mind, direct your attention to what's been marked Exhibit 4 for identification. (WHEREUPON, Exhibit 4 was marked for identification.) BY MR. GOLLIS: Q. This is another document from the New Mexico Office of the State Engineer, another Declaration of Owner of Underground Water Right. This one is for Well G-337. Will you go ahead and take a look at that for me if you wouldn't mind, and let me know when you're ready to proceed. MR. GOLLIS: Tanya, while Mr. Meech is

NAEGELI DEPOSITION & TRIAL (800)528-3335 NAEGELIUSA.COM Exhibit 2 - Walter Meech Deposition Excerpts

Case 6:01-cv-00072-MV-JHR Document 3491-2 Filed 03/15/21 Page 3 of 9 Walter Meech February 3, 2021 NDT Assgn # 36139-5 Page 8

		Walter M		II February 5, 2021 NDT Assgir# 50159-5	Faye o
		26			28
	norfoot Evhibit E		1	O And can you recall far how long these	
2	perfect. Exhibit 5.		1	Q. And can you recall for how long those wells have been have been metered?	
3	And Greg, did you receive that as well? THE REPORTER: I do have it, yes. Thank		3		
4	you.		4		
5	MR. GOLLIS: Great. Thank you. And Ed?		5	•	
	Okay.			meters on them continuously since that time?	
7	MR. BAGLEY: Sorry, I'm juggling here. I		7	-	
8	I think so.		8		
9	MR. GOLLIS: Okay. Great.		9		
10	BY MR. GOLLIS:			those meter readings?	
11	Q. I'm sorry to interrupt. Mr. Meech, are		11	A. They have, yes.	
	you ready to proceed?		12		
13	A. Yes.			those meter readings get reported?	
14	Q. Great. And do you recall if you look		14		
	at the last page of that four-page document, you'll		15	-	
	see it also contains an "Acknowledgment for Natural		-	Office?	
	Persons." And I take it that you, again, are the		17	•	
	Walter L. Meech identified on that page who signed		18		
	the declaration form. Is that correct?				
20	A. Yes.		20	mind, to direct your attention to what's been marked Exhibit 5 for identification, which is a a series	
20			20		
	Q. And do you recall when Well G-337 was drilled?		21		
22	A. 1995.			(WHEREUPON, Exhibit 5 was marked for identification.)	
23	Q. And again if you take a look at Paragraph			BY MR. GOLLIS:	
	8 on that form which is on page 3, this, again, was		24		
20	o on that form which is on page 5, this, again, was		20		
		27			29
1	an amendment after after the drilling of the	27	1	them handy for reference. I'd like to chat about	29
	an amendment after after the drilling of the well, and it indicates that the amendment was filed	27		them handy for reference, I'd like to chat about	29
2	well, and it indicates that the amendment was filed	27	2	those a little bit when you're ready.	29
2 3	well, and it indicates that the amendment was filed because the the pumping capacity of the well	27	2 3	those a little bit when you're ready. And the order of those just for the	29
2 3 4	well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of	27	2 3	those a little bit when you're ready. And the order of those just for the record and and again these came from	29
2 3 4	well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons	27	2 3 4 5	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large	29
2 3 4 5 6	well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per	27	2 3 4 5 6	those a little bit when you're ready. And the order of those just for the record and and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the	29
2 3 4 5 6 7	well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound	27	2 3 4 5 6 7	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large	29
2 3 4 5 6 7	well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per	27	2 3 4 5 6 7	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in	29
2 3 4 5 6 7 8	well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you?	27	2 3 4 5 6 7 8	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall."	29
2 3 4 5 6 7 8 9	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is 	27	2 3 4 5 6 7 8 9	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record,	29
2 3 4 5 6 7 8 9 10	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. 	27	2 3 4 5 6 7 8 9 10 11	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each	29
2 3 4 5 6 7 8 9 10 11	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? 	27	2 3 4 5 6 7 8 9 10 11	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit	29
2 3 4 5 6 7 8 9 10 11 12	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. 	27	2 3 4 5 6 7 8 9 10 11 12	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description	29
2 3 4 5 6 7 8 9 10 11 12 13	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes 	27	2 3 4 5 6 7 8 9 10 11 12 13	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E	29
2 3 4 5 6 7 8 9 10 11 12 13 14	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete.	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well exclusively on 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete.	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well G-337. 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well G-337. A. Yes. 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a meter. The brand appears to be "CARLON" C-a-r-I-o-	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well exclusively on Well G-337. A. Yes. Q. Okay. Do you recall, Mr. Meech, what the 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a meter. The brand appears to be "CARLON" C-a-r-I-o- n. And then lastly, the fourth one is a meter that	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well G-337. A. Yes. Q. Okay. Do you recall, Mr. Meech, what the source of water supply was at the mine prior to the 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 9	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a meter. The brand appears to be "CARLON" C-a-r-I-o- n. And then lastly, the fourth one is a meter that	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well G-337. A. Yes. Q. Okay. Do you recall, Mr. Meech, what the source of water supply was at the mine prior to the drilling of those two Wells 336 and 337? 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a meter. The brand appears to be "CARLON" C-a-r-I-o- n. And then lastly, the fourth one is a meter that on the bottom, just above the number "50," identifies, I think, the Brand as "HAYS," H-a-y-s,	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well exclusively on Well G-337. A. Yes. Q. Okay. Do you recall, Mr. Meech, what the source of water supply was at the mine prior to the drilling of those two Wells 336 and 337? A. It had no water except for ponding. 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a meter. The brand appears to be "CARLON" C-a-r-I-o- n. And then lastly, the fourth one is a meter that on the bottom, just above the number "50," identifies, I think, the Brand as "HAYS," H-a-y-s, with an "05" above it."	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well exclusively on Well G-337. A. Yes. Q. Okay. Do you recall, Mr. Meech, what the source of water supply was at the mine prior to the drilling of those two Wells 336 and 337? A. It had no water except for ponding. Q. Okay. And I ask this question 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a meter. The brand appears to be "CARLON" C-a-r-I-o- n. And then lastly, the fourth one is a meter that on the bottom, just above the number "50," identifies, I think, the Brand as "HAYS," H-a-y-s, with an "05" above it."	29
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 3	 well, and it indicates that the amendment was filed because the the pumping capacity of the well needed to be clarified as well as the intensity of the use. The pumping capacity it states "60 gallons per minute and the use is closer to 90 percent per year rather than the 60 percent." Does that sound familiar to you? A. Yes. Q. Okay. And I understand that Well G-337 is still operational. Is that correct? A. Yes. Q. Okay. And so at this point for purposes of operations at the Tinaja Pit Mine, for water supply purposes, you rely on Well exclusively on Well G-337. A. Yes. Q. Okay. Do you recall, Mr. Meech, what the source of water supply was at the mine prior to the drilling of those two Wells 336 and 337? A. It had no water except for ponding. Q. Okay. And I ask this question understanding that 336 currently isn't pumping, but 	27	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	those a little bit when you're ready. And the order of those just for the record and and again these came from your legal counsel, the first one is a a large face. It's it's a "Model 55 Recordall" was the first page of the exhibit. The second one is also a Recordall. It's a smaller it's a smaller face in the photograph. It's a "Model 170 Recordall." MR. GOLLIS: And also, for the record, I'll just note that the footer at the bottom of each of these photographs identifies them as an "Exhibit O - Photos of Meters on Wells" and that description was provided by counsel of record for C & E Concrete. BY MR. GOLLIS: Q. The third one in the series is a a meter. The brand appears to be "CARLON" C-a-r-I-o- n. And then lastly, the fourth one is a meter that on the bottom, just above the number "50," identifies, I think, the Brand as "HAYS," H-a-y-s, with an "05" above it." So when you've had a chance to just take a look at those, let me know and then we can proceed.	29

Case 6:01-cv-00072-MV-JHR Document 3491-2 Filed 03/15/21 Page 4 of 9 Waiter Meech February 3, 2021 NDT Assgn # 36139-5 Page 11

		1		5
	38			40
			in the star for the superstant with the state of the superstant of	
1	Q. Okay. And do you recall specific		indicates for the most part that the well was out of	
	instances of that happening in the past?		service. Does that sound right to you that that	
3	A. Yes.		well G-336 has probably been unable to pump going	
4	Q. Are you able to recall when approximately		back as far as the end of 2012, the beginning of	
5	that might have happened?	5	2013?	
6	A. No.	6	A. Yes.	
7	Q. Would instances of malfunctions be	7	Q. Okay. Are there any plans on your part,	
8	something that are recorded, that there might be	8	on C & E's part to rehabilitate that well?	
9	records of such occurrences?	9	A. Depending on our water needs, we may have	
10	A. No.	10	to. So, yes.	
11	Q. You don't recall? Or there wouldn't be	11	Q. And your present Well G-337 is	
12	records?	12	sufficient to serve your present water needs?	
13	A. There wouldn't be a record.	13	A. Yes and no. It it it does depending	
14	Q. Okay. If I could direct your attention to		if on the weather conditions. Sometimes we still	
15	what's been marked Exhibit 6 for identification.		run short.	
	(WHEREUPON, Exhibit 6 was marked for	_		
16		16	Q. In the past, I guess I'd say pre-2013,	
	identification.)		when Well G-336 was still pumping, did you how	
	BY MR. GOLLIS:		did you use the two wells? Did you let me stop	
19	Q. This is a document that was prepared, I	-	there.	
20	believe by your company, that shows meter readings	20	How did you use the two wells? And I can	
21	for Well G-336 by year. And if you go ahead and	21	elaborate if you need me to.	
22	it's it's it's fairly lengthy. I think	22	A. The 337 was for dust abatement and water	
23	there's 15 or 16 pages. If you'll just take a look	23	control, washing aggregates, adding the you know,	
24	at that and familiarize yourself with it, and then	24	water to aggregates, all those things. 336 was, you	
25	we can talk about that a little bit when you're	25	know, we we would put it where we needed it,	
_				
	39			41
1	39 ready.	1	whether it was for for for the for the	41
1			whether it was for for for the for the office, for the bathroom or for, you know, if we	41
	ready.	2		41
2	ready. A. Okay.	2 3	office, for the bathroom or for, you know, if we	41
2 3	ready. A. Okay. Q. Okay. You're all set?	2 3	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for	41
2 3 4	ready. A. Okay. Q. Okay. You're all set? A. Yes.	2 3 4 5	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control.	41
2 3 4 5	ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay.	2 3 4 5 6	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was	41
2 3 4 5 6 7	ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it	2 3 4 5 6	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their	41
2 3 4 5 6 7	ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter	2 3 4 5 6 7	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair?	41
2 3 4 5 6 7 8	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 	2 3 4 5 6 7 8 9	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go	41
2 3 4 5 6 7 8 9 10	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the 	2 3 4 5 6 7 8 9 10	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient	41
2 3 4 5 6 7 8 9 10 11	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were 	2 3 4 5 6 7 8 9 10 11	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow	41
2 3 4 5 6 7 8 9 10 11 12	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." 	2 3 4 5 6 7 8 9 10 11 12	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source?	41
2 3 4 5 6 7 8 9 10 11 12 13	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out 	2 3 4 5 6 7 8 9 10 11 12 13	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our	41
2 3 4 5 6 7 8 9 10 11 12 13 14	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? 	2 3 4 5 6 7 8 9 10 11 12 13 14	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant.	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that 	2 3 4 5 6 7 8 9 10 11 12 13 14 15	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs?	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has.	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the past stopped pumping and obviously it had stopped 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has that been something that you've done?	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the past stopped pumping and obviously it had stopped pumping by 2016. Is that right? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has that been something that you've done? A. I I don't know.	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the past stopped pumping and obviously it had stopped pumping by 2016. Is that right? A. Yes. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has that been something that you've done? A. I I don't know. Q. If I could direct your attention, Mr.	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the past stopped pumping and obviously it had stopped pumping by 2016. Is that right? A. Yes. Q. Okay. And if you flip those pages and 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has that been something that you've done? A. I I don't know. Q. If I could direct your attention, Mr. Meech and I apologize that the pages of this	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 3	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the past stopped pumping and obviously it had stopped pumping by 2016. Is that right? A. Yes. Q. Okay. And if you flip those pages and take a look at the same is true for 2015, that is 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has that been something that you've done? A. I I don't know. Q. If I could direct your attention, Mr. Meech and I apologize that the pages of this exhibit aren't numbered, but if you turn to the very	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the past stopped pumping and obviously it had stopped pumping by 2016. Is that right? A. Yes. Q. Okay. And if you flip those pages and take a look at the same is true for 2015, that is to say the meter readings note that it's "out of 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has that been something that you've done? A. I I don't know. Q. If I could direct your attention, Mr. Meech and I apologize that the pages of this exhibit aren't numbered, but if you turn to the very last page which shows the meter readings for 2001	41
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 ready. A. Okay. Q. Okay. You're all set? A. Yes. Q. Okay. So on the first page of this document, it shows meter it shows the the date of a meter reading and those dates are the the first day of each month in the calendar. And in the case of 2016, which is shown on the first page, it says the meter reading for each of those occurrences were "out of service." To your knowledge what does that mean "out of service" noted there on that document Exhibit 6? A. There was no water pumped out of that well. Q. Okay. And so consistent with what you told us previously, Well G-336 at some point in the past stopped pumping and obviously it had stopped pumping by 2016. Is that right? A. Yes. Q. Okay. And if you flip those pages and take a look at the same is true for 2015, that is 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	office, for the bathroom or for, you know, if we needed to, we would put it in the tank for for dust abatement and water control. Q. Consistent consistent with their pumping capacity as though it sounds like 336 was largely kind of supplemental to 337. Is that fair? A. Yes. Q. How do you if if G-337 if you go through periods of time where G-337 is insufficient to meet C C & E's needs, do you somehow supplement water from another source? A. We do. We bring it up from Milan our our concrete plant and haul it up to the plant. Q. Okay. And is that something currently that that occurs? A. It has. Q. Okay. And how far back into the past has that been something that you've done? A. I I don't know. Q. If I could direct your attention, Mr. Meech and I apologize that the pages of this exhibit aren't numbered, but if you turn to the very last page which shows the meter readings for 2001	41

NAEGELI DEPOSITION & TRIAL (800)528-3335 NAEGELIUSA.COM Exhibit 2 - Walter Meech Deposition Excerpts

	50			52
1	and then it flipped over and started over again.	1	Q. In the case of Well G-336, which is not	
2	Q. Okay.	2	currently pumping, do you know do you submit	
3	A. Not re-set, but it actually, I guess it		meter readings nonetheless to the State or or	
4	maxed out on its meter and it started over again.	4	not?	
5	Q. Okay. And would it have been C & E policy	5	A. I'm not clear on that. No.	
6	at that time to note that in the in the meter	6	Q. You're not clear on my question? Or	
7	reading logs that there was a turnover?	7	you're not clear whether those records are being	
8	A. I'm not sure.	8	submitted?	
9	Q. Okay. And if I could direct your	9	A. I am not I'm not clear on whether we	
10	attention actually to it's the very first page of	10	submit the records on G-336.	
11	the exhibit. It's the meter readings for calendar	11	Q. Okay. I ask because it's more likely that	
	year 2016.	12	my question wasn't clear, but thank you for that.	
13	Are you ready?	13	A. No problem.	
14	A. Yes.	14	Q. You may have mentioned early on that there	
15	Q. Okay. If you'll look at the the meter	15	has been some repairs done to one or both of the	
16	reading for the month of April, "April 1, 2016," the		wells over the years. Is that right?	
	reading is in the tens of thousands, it's "60700."	17	A. That is correct. Yes.	
	The subsequent month, the month of May, "May 1,	18	Q. Okay. Let me direct your attention to the	
	2016," the reading is only in the hundreds, it's	19	last exhibit that's marked Exhibit 8 for	
	"740."	20	identification, which is a series of invoices that C	
21	Are you able and we discussed this	21	& E received for, I think, what can fairly be	
	previously in the case of Well G-336. Are you able		described as repairs to the wells that we received	
	to say why there would have been a change in the		from your attorney.	
	order of magnitude of the reading there, the	24	(WHEREUPON, Exhibit 8 was marked for	
	numbers?	25	identification.)	
_				
	51			53
1	51 A. Probably a change of meters.	1	BY MR. GOLLIS:	53
1		1 2	BY MR. GOLLIS: Q. And if you take a look at those for a	53
2	A. Probably a change of meters.	2		53
2 3	A. Probably a change of meters.Q. Okay. And again, in the case of this	2 3	Q. And if you take a look at those for a	53
2 3 4	A. Probably a change of meters.Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in	2 3	Q. And if you take a look at those for a moment and let me know when you're ready, I'd like	53
2 3 4 5	A. Probably a change of meters.Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the	2 3 4	Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs.	53
2 3 4 5	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? 	2 3 4 5 6	Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs.A. Okay. Go ahead.	53
2 3 4 5 6 7 8	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in 	2 3 4 5 6	Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs.A. Okay. Go ahead.Q. All right. This one is easy. We'll start	53
2 3 4 5 6 7 8 9	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the 	2 3 4 5 6 7	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes	53
2 3 4 5 6 7 8 9	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in 	2 3 4 5 6 7 8	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice 	53
2 3 4 5 6 7 8 9 10	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the 	2 3 4 5 6 7 8 9	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes	53
2 3 4 5 6 7 8 9 10	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. 	2 3 4 5 6 7 8 9 10	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to?	53
2 3 4 5 6 7 8 9 10 11	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? 	2 3 4 5 6 7 8 9 10 11	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well	53
2 3 4 5 6 7 8 9 10 11 12 13	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. 	2 3 4 5 6 7 8 9 10 11 12	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to?	53
2 3 4 5 6 7 8 9 10 11 12 13 14	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for 	2 3 4 5 6 7 8 9 10 11 12 13 14	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337.	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. Q. The State has records through the end of 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. A. It looks like the pump and motor. 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. A. It looks like the pump and motor. Q. Okay. If you flip to the the next 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. Q. The State has records through the end of 2020? Is that right? A. That is correct. 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. A. It looks like the pump and motor. Q. Okay. If you flip to the the next page, the second page, the invoice there is an 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. Q. The State has records through the end of 2020? Is that right? A. That is correct. Q. Okay. And the reporting requirements 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. A. It looks like the pump and motor. Q. Okay. If you flip to the the next page, the second page, the invoice there is an invoice from Coyote Drilling, Inc., to you and C & 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. Q. The State has records through the end of 2020? Is that right? A. That is correct. Q. Okay. And the reporting requirements currently in place are for C & E to submit the meter 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. A. It looks like the pump and motor. Q. Okay. If you flip to the the next page, the second page, the invoice there is an invoice from Coyote Drilling, Inc., to you and C & E, that's dated April 19th, 2016. 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. 1 1 yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. Q. The State has records through the end of 2020? Is that right? A. That is correct. Q. Okay. And the reporting requirements currently in place are for C & E to submit the meter readings, again, on a monthly basis? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. A. It looks like the pump and motor. Q. Okay. If you flip to the the next page, the second page, the invoice there is an invoice from Coyote Drilling, Inc., to you and C & E, that's dated April 19th, 2016. If you take a look at the description of 	53
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 A. Probably a change of meters. Q. Okay. And again, in the case of this particular one, if there, in fact, was a change in meters, there wouldn't be other records of the change. We would know that only from this meter reading data. Is that correct? A. I I yeah, I think so. Q. Okay. And again, at this point in calendar year 2016, Ed Moreland would have been the the individual at C & E who would have been responsible for reading the meters? A. Yes. Q. These records for calendar year 2016, for the meter readings for Well G-337 were the last records submitted by C & E to the New Mexico Office of State Engineer. Are you able to say why that is? A. Well, we've actually updated it and we have we are current with the State right now. Q. The State has records through the end of 2020? Is that right? A. That is correct. Q. Okay. And the reporting requirements currently in place are for C & E to submit the meter 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 Q. And if you take a look at those for a moment and let me know when you're ready, I'd like to ask you a few questions about well repairs. A. Okay. Go ahead. Q. All right. This one is easy. We'll start right at the beginning. If you take a look at that first invoice that's dated "August 6th, 2014," and it describes repairs, labor, service, equipment that was was used, are you able to say, Mr. Meech, which well that work relates to? A. G-337. Q. Okay. And do you recall what the purpose of that work was? A. Reading from this invoice, they replaced the pump. Q. Okay. A. It looks like the pump and motor. Q. Okay. If you flip to the the next page, the second page, the invoice there is an invoice from Coyote Drilling, Inc., to you and C & E, that's dated April 19th, 2016. 	53

Case 6:01-cv-00072-MV-JHR Document 3491-2 Filed 03/15/21 Page 6 of 9 Water Meech February 3, 2021 NDT Assgn # 36139-5 Page 15

		vallel wee	cn	February 5, 2021 IND TASSON # 50159-5	Page 15
		54			56
1	of the wells this work related to?		1	Q. Okay. And is it also fair to say that	
2	A. G-337.		-	that that well operates still at at about 90	
3	Q. Okay. G-337 also. And do you recall		3	percent of the time as you had indicated in that	
4	,		4	Amended Well Declaration back in '03?	
5	after the first repair what the what the		5	A. Yes. Well, you know, if we can get 100	
6	purpose or the reason for this repair was?		6	percent, we'd go for 100 percent; but, you know	
7	A. Looks like they pulled the pump and motor		7	Q. Whatever you can get out of it in other	
8	and replaced it.		8	words.	
9	Q. Okay. So that would have been a second		9	A. Yeah, whatever we can get out of the well.	
10	motor replacement just a year and a half after the		10	Q. Okay. Are you able to estimate at present	
11	previous one.		11	how much water you all were importing from your	
12	A. Yeah. Mining's tough on motors out there.		12	Milan facility to make up for the inability of 337	
13	Q. I'll bet it I'll bet it is.		13	to keep up with the needs at the mining facility?	
14	If you turn to the third page now, which		14	A. The water that we were hauling from	
15	is another invoice from Coyote Drilling, this one is		15	from town was not enough to keep up. We were just	
	dated September 7, 2016. So almost a half a year			trying to maintain, but we were still below	
17	later, and it refers only to a pump test that was			standards as far as what we needed to be able to	
18	done on one of the wells. Do you recall which well			to to be able to fully operate. We were running	
	that would have been?		19	we could only run we only had one tank and we	
20	A. It would have been G-337.		20	were running about six to seven loads a day, I think	
21	Q. Okay. And do you recall, by any chance,		21	is what it was. And it's a 6,000 gallon tank.	
22	what the what the need for the pump test was at		22	Q. And when you say "six or seven loads a	
23	that point in time back in September 2016?		23	day," are you talking about water truck loads?	
24	A. I think our our volume of water was		24	A. Yes, sir.	
	getting it was dropping, and so they were you		25	Q. And and what's the size of the of	
20	getting it was dropping, and so they were you		20		
		55			57
1	know. I'm assuming we were trying to test to see if	55	1	the water trucks you all were using?	57
	know, I'm assuming we were trying to test to see if	55		the water trucks you all were using?	57
2	it was related to the pump and motor.	55	2	A. 6,000 gallons.	57
2 3	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted	55	2 3	A. 6,000 gallons.Q. And what's the source of the water at your	57
2 3 4	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New	55	2 3 4	A. 6,000 gallons.Q. And what's the source of the water at your Milan facility?	57
2 3 4 5	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you	55	2 3 4 5	A. 6,000 gallons.Q. And what's the source of the water at yourMilan facility?A. The Village of Milan.	57
2 3 4 5 6	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring	55	2 3 4 5 6	A. 6,000 gallons.Q. And what's the source of the water at yourMilan facility?A. The Village of Milan.Q. You're part of the public drinking water	57
2 3 4 5 6 7	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that	55	2 3 4 5 6 7	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? 	57
2 3 4 5 6 7 8	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you	55	2 3 4 5 6 7 8	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. 	57
2 3 4 5 6 7 8 9	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well	55	2 3 4 5 6 7 8 9	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to 	57
2 3 4 5 6 7 8 9 10	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337.	55	2 3 4 5 6 7 8 9 10	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the 	57
2 3 4 5 6 7 8 9 10 11	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir.	55	2 3 4 5 6 7 8 9 10 11	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could 	57
2 3 4 5 6 7 8 9 10 11 12	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the	55	2 3 4 5 6 7 8 9 10 11 12	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. 	57
2 3 4 5 6 7 8 9 10 11 12 13	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled	55	2 3 4 5 6 7 8 9 10 11 12 13	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth 	57
2 3 4 5 6 7 8 9 10 11 12 13 14	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description	55	2 3 4 5 6 7 8 9 10 11 12 13 14	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? 	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. 	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. Q. Do you have any idea at present what the	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and they took a video of the well. Do you recall which 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. Q. Do you have any idea at present what the pumping capacity of that Well G-337 is?	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and they took a video of the well. Do you recall which well that work was completed on? 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	 it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. Q. Do you have any idea at present what the pumping capacity of that Well G-337 is? A. We're closer to probably 65. 	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 1	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and they took a video of the well. Do you recall which well that work was completed on? A. G-337. 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	 it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. Q. Do you have any idea at present what the pumping capacity of that Well G-337 is? A. We're closer to probably 65. Q. Okay. 	55	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and they took a video of the well. Do you recall which well that work was completed on? A. G-337. Q. Okay. Is it fair to say at this point, in 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. Q. Do you have any idea at present what the pumping capacity of that Well G-337 is? A. We're closer to probably 65. Q. Okay. A. We we have it chocked down to about 48, 	55	$\begin{array}{c} 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\end{array}$	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and they took a video of the well. Do you recall which well that work was completed on? A. G-337. Q. Okay. Is it fair to say at this point, in 2016-2017, there was no work ongoing on on Well 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. Q. Do you have any idea at present what the pumping capacity of that Well G-337 is? A. We're closer to probably 65. Q. Okay. 	55	$\begin{array}{c} 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\\ 24\end{array}$	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and they took a video of the well. Do you recall which well that work was completed on? A. G-337. Q. Okay. Is it fair to say at this point, in 	57
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	 it was related to the pump and motor. Q. Okay. Back in 2003, when you submitted the Amended Declaration of Water Right to the New Mexico Office of State Engineer, you had you indicated on that declaration and I'm referring to Exhibit 4 that the pumping capacity of that well was "60 gallons per minute." And I'll give you a chance to turn to that Declaration Form for Well G-337. A. Yes, sir. Q. And it does say if you'll look at the second page, which is page 1 of the form you filled out, it does say that the under "3. Description of Well" that the original capacity was 60 gallons per minute, and the present capacity in 2003 was also 60 gallons per minute. Do you see that? A. Yes. Q. Do you have any idea at present what the pumping capacity of that Well G-337 is? A. We're closer to probably 65. Q. Okay. A. We we have it chocked down to about 48, 	55	$\begin{array}{c} 2\\ 3\\ 4\\ 5\\ 6\\ 7\\ 8\\ 9\\ 10\\ 11\\ 12\\ 13\\ 14\\ 15\\ 16\\ 17\\ 18\\ 19\\ 20\\ 21\\ 22\\ 23\end{array}$	 A. 6,000 gallons. Q. And what's the source of the water at your Milan facility? A. The Village of Milan. Q. You're part of the public drinking water system down there, whatever the case may be? A. Yes, sir. Q. Okay. Back to if we can go back to Exhibit 8, Mr. Meech, which is the invoices, the well repair invoices, if I could A. Yes. Q ask you to turn to the the fourth page, which is an invoice from L and C Inc., to C & E dated April 10, 2017. A. Yes, sir. Q. And that one, as you can see, it looks like there was another pump pulled from the well and they took a video of the well. Do you recall which well that work was completed on? A. G-337. Q. Okay. Is it fair to say at this point, in 2016-2017, there was no work ongoing on on Well 	57

58	60
1 Q. It was sitting idle at the time. It	1 proved to be not a a smart thing on our part to
2 wasn't pumping; correct?	2 let him do that.
3 A. Yes.	3 Q. And so the purpose of this repair was to -
4 Q. Okay. And do you recall in the case of	4 - was to essentially fix that problem.
5 this fourth invoice, what what was the need that	5 A. Yes, sir.
6 arose that you needed them to pull that pump again	6 Q. Okay. And were you successful in that?
7 and take a look at that well?	7 A. Yes.
8 A. We we needed to look down. We we	8 Q. Okay. And on the back of that invoice on
9 were having problems with the well, and we needed to	9 the next page, there's another invoice from Coyote
10 look down it and see what the what was going on	10 Drilling dated just a a couple of days a
11 inside of it and see what solutions that the well	11 couple of weeks later, June 20th, 2017. Again, I
12 companies suggested for repairs on it.	12 imagine it's probably fair to say this was work that
13 Q. And when you say you were having problems	13 was completed on on Well G-337?
14 with the well, is that the the pumping capacity	14 A. Yes.
15 of 60, 65 gallons per minute max, just you weren't	15 Q. Okay. And is this showing essentially
16 hitting anywhere close to that? Is that the what	16 completion of the work that had begun as shown on
17 was happening?	17 the previous invoice?
18 A. Correct. Yes.	18 A. Yes.
19 Q. And if you recall, when you had the	19 Q. Okay. And I do see here that one of the
20 when you had those problems back in 2016-2017, what	20 entries dated June 16th, 2017, indicates that a
21 was the the pumping capacity of of the well	21 meter was installed on that well?
22 going down to that that that raised the	A. Yes.Q. Okay. And that would have been at that
23 concerns? 24 A. I I'm not sure.	Q. Okay. And that would have been at thattime, I would imagine a a new meter, or would
25 Q. But it must have been something noticeable	24 time, i would imagine a a new meter, or would25 they have replaced a meter that had previously been
59	
1 obviously	1 on the well?
1 obviously 2 A. Yes, sir.	 on the well? A. You know, I would have to say they
 obviously A. Yes, sir. Q operational. 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's
 obviously A. Yes, sir. Q operational. A. Yes. 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there.
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay.
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I understand
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- tase it. If I remember right, when LC Jones first 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work.
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- case it. If I remember right, when LC Jones first did the well, he only cased it down so far and we 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work. A. Yes.
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- case it. If I remember right, when LC Jones first did the well, he only cased it down so far and we didn't have casing on the lower part of the well. 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work. A. Yes. Q. Okay. Is that something that Ed Moreland
 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- case it. If I remember right, when LC Jones first did the well, he only cased it down so far and we didn't have casing on the lower part of the well. So we had to have them go in and re-drill this and 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work. A. Yes. Q. Okay. Is that something that Ed Moreland might know? Or who at C & E might know for sure
 1 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- case it. If I remember right, when LC Jones first did the well, he only cased it down so far and we didn't have casing on the lower part of the well. So we had to have them go in and re-drill this and then case that. And there was still enough room to be able to get a big the bigger motor in there to do it, but it what had happened was is it started 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work. A. Yes. Q. Okay. Is that something that Ed Moreland might know? Or who at C & E might know for sure that that, in fact, was the case? A. The closest person would be Ed. Q. Okay. Let's take a look if we if if
 1 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- case it. If I remember right, when LC Jones first did the well, he only cased it down so far and we didn't have casing on the lower part of the well. So we had to have them go in and re-drill this and then case that. And there was still enough room to be able to get a big the bigger motor in there to do it, but it what had happened was is it started to collapse on that lower part. 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work. A. Yes. Q. Okay. Is that something that Ed Moreland might know? Or who at C & E might know for sure that that, in fact, was the case? A. The closest person would be Ed. Q. Okay. Let's take a look if we if if
 1 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- case it. If I remember right, when LC Jones first did the well, he only cased it down so far and we didn't have casing on the lower part of the well. So we had to have them go in and re-drill this and then case that. And there was still enough room to be able to get a big the bigger motor in there to do it, but it what had happened was is it started to collapse on that lower part. Johnny Jones or LC Jones, he didn't think 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work. A. Yes. Q. Okay. Is that something that Ed Moreland might know? Or who at C & E might know for sure that that, in fact, was the case? A. The closest person would be Ed. Q. Okay. Let's take a look if we if if we would at the at the next invoice, which is again another another invoice from Coyote. I
 1 obviously A. Yes, sir. Q operational. A. Yes. Q. The next invoice on the fifth the fifth page, which is another invoice from Coyote Drilling to C & E, this is dated a couple of months later, June 7, 2017. This was quite a bit of work. Can you I I guess, first, can we confirm that this was work again completed on Well G-337? A. Yes. Q. Okay. And do you recall what the nature of this work was? A. It was to go in and clean this out and re- case it. If I remember right, when LC Jones first did the well, he only cased it down so far and we didn't have casing on the lower part of the well. So we had to have them go in and re-drill this and then case that. And there was still enough room to be able to get a big the bigger motor in there to do it, but it what had happened was is it started to collapse on that lower part. 	 on the well? A. You know, I would have to say they replaced the one that was on there because there's no they don't have the cost of putting the new meter on there. Q. Okay. A. So I Q. And so I I A I mean, I'm I'm just looking at the invoice. That's all I Q. No, no, no, I understand. So so you you're guessing, and I I I I understand that, but you're guessing that that they they re-installed the meter that had been on the well before they performed that work. A. Yes. Q. Okay. Is that something that Ed Moreland might know? Or who at C & E might know for sure that that, in fact, was the case? A. The closest person would be Ed. Q. Okay. Let's take a look if we if if

		vvalter iviee	ecn	February 3, 2021 NDT Assgn # 36139-5	Page 17
		62			64
1 1	sn't new work. This this invoice well, let		1	Q. Okay. And to your knowledge has there	
	ne ask you.		1	been any work subsequently since January of 2019, on	
3	Is the invoice from Coyote Drilling dated			Well G-337?	
	luly 1, 2017, again, work that was performed on Well		4	A. The only work that we've had outside of	
	G-337?			that is just getting the phase converters dialed in	
6	A. It's it's the same invoice as the one			for the pump is converting single phase to three	
	which was Invoice 5513 is the same one that's		7	phase. So that would just be the the Carl	
	7/1/2017.			Hoffman, the electrician, doing the work on that	
9	Q. Got it. Okay. So it's just a different		9	side of it.	
	nvoice for the for the exact same work.		10	Q. And that's it that's just, if I	
11	A. Yes.		11	understand you correctly, that's just electrical	
12	Q. Okay. And if we can turn to the next one,			work, so to speak.	
	again, from Coyote Drilling, an invoice to C & E		13	A. Yes.	
	lated January 7, 2019, if you take a look at		14	Q. Okay. Have there been any repairs or any	
	hat, are you able to confirm that this, again, was				
	vork performed on Well G-337?		16	G-336 in the last five, six, seven years?	
17	A. Yes.		17	A. No.	
18	Q. And are you able to recall what the nature		18	Q. Okay. Are there any current plans to have	
19 o	of this work was?		19	any such work performed?	
20	A. After we did the fixing of the well, then		20	A. There are plans. As you can see, we kind	
21 v	ve had the it changed the integrity of the water		21	of put all our money into G-337.	
	a little bit, and we were having an issue with the		22	Q. Okay.	
	vater actually causing a green moss or buildup. I		23	We are I'm I'm just about done. I	
24 d	lon't know what they're called. I I don't know		24	think I have a few more questions for you.	
25 tl	he the name of it, but we had to change the pipe		25	I want to talk a little bit about kind of	
		63			65
1 c	but and go to stainless steel.	63	1	operations at the Tinaia Pit Mine facility and the	65
	out and go to stainless steel. So on the second item that says "Quantity	63		operations at the Tinaja Pit Mine facility and the use of water in those operations.	65
2	So on the second item that says "Quantity	63		use of water in those operations.	65
2 3 8	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we	63	2 3	use of water in those operations. So as I understand it, one one	65
2 3 8 4 h	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to	63	2 3 4	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust	65
2 3 8 4 h 5 s	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we	63	2 3 4	use of water in those operations. So as I understand it, one one	65
2 3 8 4 h 5 s 6 u	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast	63	2 3 4 5	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct?	65
2 3 8 4 h 5 s 6 u 7 ir	So on the second item that says "Quantity B," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building	63	2 3 4 5 6 7	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes.	65
2 3 8 4 h 5 s 6 u 7 ir	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there	63	2 3 4 5 6 7	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before.	63	2 3 4 5 6 7 8	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done?	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice	63	2 3 4 5 6 7 8 9	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and	63	2 3 4 5 6 7 8 9 10 11	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe.	63	2 3 4 5 6 7 8 9 10 11 12	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the -	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast rron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes.	63	2 3 4 5 6 7 8 9 10 11 12 13	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded,	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12 13 14	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay.	63	2 3 4 5 6 7 8 9 10 11 12 13 14	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12 13 14	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the pump was okay. The	63	2 3 4 5 6 7 8 9 10 11 12 13 14	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12 13 14 15 p 16	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we nad to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace.	63	2 3 4 5 6 7 8 9 10 11 12 13 14 15	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12 13 14 15 p 16	So on the second item that says "Quantity a," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in	63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12 13 14 15 p 16 17 t	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in hat well, the stainless steel pipe?	63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary crusher.	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12 13 14 15 p 16 17 tl 18 19	So on the second item that says "Quantity a," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in hat well, the stainless steel pipe? A. Yes.	63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	 use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary crusher. Q. And and how many water trucks do do 	65
2 3 8 4 h 5 s 6 u 7 ir 8 b 9 10 c 11 r 12 13 14 15 p 16 17 tl 18 19 20 ir	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in hat well, the stainless steel pipe? A. Yes. Q. Okay. Okay. And then just the last	63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary crusher. Q. And and how many water trucks do do do you all have operating out at C & E?	65
2 3 4 4 5 5 6 4 7 15 9 10 11 12 13 14 15 17 16 17 11 18 19 10 17 11 12 13 14 15 17 17 17 18 19 10 10 11 12 13 14 15 17 17 17 18 19 10 10 11 12 13 14 17 17 17 18 19 10 10 10 10 10 10 10 10 10 10	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we nad to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in hat well, the stainless steel pipe? A. Yes. Q. Okay. Okay. And then just the last nvoice if I can direct your attention to that one,	63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary crusher. Q. And and how many water trucks do do do you all have operating out at C & E? A. II could you make that a little	65
2 3 4 4 5 5 6 4 7 1 8 9 10 c 11 r 12 13 14 15 p 16 17 tl 18 19 20 ir 21 it 22 11 13	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we nad to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in hat well, the stainless steel pipe? A. Yes. Q. Okay. And then just the last nvoice if I can direct your attention to that one, it's from Coyote Drilling dated February 1, 2019.	63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary crusher. Q. And and how many water trucks do do do you all have operating out at C & E? A. I I could you make that a little clearer in reference to the question?	65
2 3 4 4 5 5 6 4 7 17 8 9 10 c 11 r 12 13 14 15 p 16 17 11 18 19 20 ir 21 it 23 tt 23 tt 23 10 20 20 20 20 20 20 20 20 20 2	So on the second item that says "Quantity 8," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in hat well, the stainless steel pipe? A. Yes. Q. Okay. Okay. And then just the last invoice if I can direct your attention to that one, it's from Coyote Drilling dated February 1, 2019. f I'm reading this correctly, this is just the	63	$ \begin{array}{c} 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 \\ \end{array} $	 use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary crusher. Q. And and how many water trucks do do - do you all have operating out at C & E? A. I I could you make that a little clearer in reference to the question? Q. Sure. So you you use water trucks to apply you use trucks to apply water for dust control purposes to the roads within the mine 	65
2 3 4 4 5 5 6 4 7 17 8 9 10 c 11 r 12 13 14 15 p 16 17 11 18 19 20 ir 21 it 22 11 23 11 23 11 23 11 23 20 20 20 20 20 20 20 20 20 20	So on the second item that says "Quantity a," that "SS" is stainless steel pipe. And so we had to we had to put stainless steel in there to stop the buildup of the black whatever was building up on the on the cast cast iron or not cast ron, but the galvanized pipe that was in there before. Q. Okay. So if I understand this invoice correctly, they actually had to go back in and eplace 11 1200 feet of pipe. A. Yes. Q. Okay. A. The the the pump was okay. The bipe, we had to replace. Q. And is that the pipe that's currently in hat well, the stainless steel pipe? A. Yes. Q. Okay. Okay. And then just the last invoice if I can direct your attention to that one, t's from Coyote Drilling dated February 1, 2019. f I'm reading this correctly, this is just the he just another invoice for that same work that	63	$ \begin{array}{c} 2 \\ 3 \\ 4 \\ 5 \\ 6 \\ 7 \\ 8 \\ 9 \\ 10 \\ 11 \\ 12 \\ 13 \\ 14 \\ 15 \\ 16 \\ 17 \\ 18 \\ 19 \\ 20 \\ 21 \\ 22 \\ 23 \\ 24 \\ \end{array} $	 use of water in those operations. So as I understand it, one one operational kind of function that uses water is dust control on the roads up there? Is that correct? A. Yes. Q. Okay. And would you describe for us how that's how that's done? A. We have water trucks that fill up at a at a tower and then they take the water and then they spread it on the roads that we travel for the - the trucks that bring that come to get loaded, and then also they are (audiovisual disruption) stuff in the pit to keep the dust down in the pit for where we have to go pick up the rock to take it to the universal impact crusher, the primary crusher. Q. And and how many water trucks do do - do you all have operating out at C & E? A. I I could you make that a little clearer in reference to the question? Q. Sure. So you you use water trucks to apply you use trucks to apply water for dust 	65

		1		
	74			76
1	Q. So so with that clarification in mind,	1	Q. Is that would you say do you fill	
	is it fair to say that the the single pond that		those ponds is it a continuous flow of water?	
	has two labels SP-69A, which is the portion of that		occasional flow? How would you describe that?	
	pond in Section 33, and SP-69B, which is that	4	A. It's pretty continuous. So you have to	
	portion of the same pond in Section 4, that that		keep water going in there all the time because of	
	pond in total is utilized in the sand plant process?		evaporation and and and the absorption of the	
7			of the rock absorbing the water into into its	
8	Q. And in addition, the pond just to the		into the aggregate.	
9	north of it, 8B-1-SP68, is also utilized in the	9	Q. That's all limestone underlying those	
	process.	-	ponds?	
11	A. Yes.	11	A. No. Sandstone.	
12	Q. And those are the two ponds to which you	12	Q. Sandstone. But it's pretty porous in	
	initially referred.		in in any regard?	
14	A. Yes.	14	A. Yes.	
15	Q. Okay. Let's start with and I'll just	15	Q. Okay. Is there a particular kind of	
16	refer to to it as "SP-69." We can lose the "A"	16	schedule or is it, as you said, just typically more	
	and the "B" because it we we now know it's the	17	often than not it's a continuous fill going on then?	
	same pond.	18	A. More often than not continuous.	
19	What's the source of the water in that	19	Q. Okay. Is and and and could you	
20	pond?	20	describe for me so what's the interplay	
21	A. G-337.	21	operationally in the using those ponds for the	
22	Q. Okay. And what is the source of the water	22	production of sand?	
23	in Pond SP68?	23	A. I guess I'm not clear on what you mean by	
24	A. G-337.	24	"interplay."	
25	Q. Okay. How how does C & E fill those	25	Q. I guess I'm I'm trying to picture in my	
	75			77
1	ponds? Is it well, let me let me stop there	1	mind how you're producing the final product using	
	and let you answer that first.		those ponds.	
3	A. We we have two I don't know, it's	3	A. The	
	like 36,000 gallon tanks at the bottom down there	4	Q. What	
	were the G-337 is, and we pump water into it, and	5	A. Okay. All right. Let me	
	then we pump it up the hill to there's five or	6	Q. Does that make sense? Or	
	six tanks up the hill that we store it in there, and	7	A. I I think we the ponds are an	
	then it and then we run it off into those ponds.	8	upper and lower pond, and they have what we call	
9	Q. And when you say "up the hill" from the	9	"weirs" on them.	
	location of G-337, do you mean do you mean in	10	Q. Right.	
	kind of a northerly a northeasterly direction	11	A. An as we wash the material, as the	
	towards the ponds? Or where are the where is		material goes in let me explain the process. The	
140		1		

12 towards the ponds? Or where are the -- where is13 that series of tanks located?

A. I -- I would say northeasterly direction
that we have piping that runs from the -- where that

16 well is and those storage tanks all the way up to

17 where the storage tanks are up there where the wash18 plant is.

19 Q. Okay.

20 A. And -- and it's going uphill.

21 Q. That's -- that's uphill all the way.

22 A. Yes.

23 Q. Okay. And from that series of tanks, you

24 fill the two ponds.

25 A. Yes.

18 across the weir and then it's picked up in a pump

13 material is dumped into the bin. It goes across a

14 set of screens and there are spray bars that are

15 spraying the -- the material to wash it. And then

17 -- and the finer, the lighter material goes off

16 it goes to the sand screw that carries it up and the

19 and it's pumped to the upper pond. And that's where

20 all the solids are dumped.

21 They have a polymer that goes in with this

- 22 material and it drops the solids out and then the
- 23 clean water comes across, it comes over the weir.
- 24 And then as it starts to fill up, they put another
- $25\,$ board in there to raise the weir so that the solids

DEPOSITION & TRIAL

Exhibit 2 - Walter Meech Deposition Excerpts