

c/o Law & Resource Planning Associates, P.C.
201 Third St. NW, Suite 1750
Albuquerque, NM 87102
(505) 346-0998

Mr. Meech is the President of C&E Concrete, Inc., which uses the water rights at issue in this subfile for mining and other industrial purposes. Mr. Meech has information regarding the past historical use of the water rights, the plan to develop the water rights for mining and other industrial purposes, and the placing of water to beneficial use for mining and other industrial purposes. Mr. Meech has information regarding the nature and extent of the mineral deposit at the Tinaja Pit Mine that is owned and mined by C&E Concrete, Inc. and regarding future plans for extraction of minerals from the mine.

C. Chris Meech
c/o Law & Resource Planning Associates, P.C.
201 Third St. NW, Suite 1750
Albuquerque, NM 87102
(505) 346-0998

Mr. Meech is a director of C&E Concrete, Inc., which uses the water rights at issue in this subfile for mining and other industrial purposes. Mr. Meech has information regarding the past historical use of the water rights, the plan to develop the water rights for mining and other industrial purposes, and the placing of water to beneficial use for mining and other industrial purposes.

D. Karl Hoffman
Grants, New Mexico
(505) 280-8967

Mr. Hoffman is an electrician who has information regarding the use of wells G-336 and G-337 and the pumping capacity of the wells.

E. Ed Morlan
C&E Concrete, Inc.
500 Elkins Road
Grants, New Mexico 87020
(505) 287-2944

Mr. Marlan is the crusher supervisor at the Tinaja Pit Mine, owned and operated by C&E Concrete, Inc., and is familiar with operations at the mine, including water usage and compliance with the mine's Clean Air Permit.

F. Weston Bohannon
Coyote Drilling
P.O. Box 3467
Milan, New Mexico 87021
(505) 240-7519

Mr. Bohannon works for Coyote Drilling and is familiar with G-336 and G-337, including the capacities of the wells, water production from the wells, and repairs and other improvements to the well(s).

2. Defendant identifies the following documents and/or tangible things that she has in

her possession, custody or control and that she may use to support her claims in this matter:

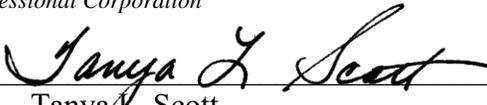
- A. New Mexico Mining Permit for C&E Concrete, Inc.
- B. New Mexico Clean Air Permit for C&E Concrete, Inc.
- C. Tinaja Mine Plan and Permit Application
- D. Records of water use at the Tinaja Pit Mine
- E. Volvo Equipment Video
- F. Summary of water meter readings from G-336
- G. Summary of water meter readings from G-377
- H. Meter readings from G-336
- I. Meter readings from G-337
- J. *Handling Harsh Conditions*, Rock Products, November 2016
- K. Photographs of Operations at the Tinaja Pit Mine
- L. Drone images of operations at the Tinaja Pit Mine
- M. Tinaja Pit Mine Crusher, 3-D Survey, 2017
- N. Invoices for Major Well Repairs
- O. Photographs of meters on wells**
- P. Power Point presentation on C&E Concrete, Inc.
- Q. Satellite Imagery, dated 11/3/58
- R. Satellite Imagery, dated 8/25/75
- S. Satellite Imagery, dated 6/9/81
- T. Satellite Imagery, dated 6/18/86
- U. Satellite Imagery, dated 6/17/91
- V. Satellite Imagery, dated 10/6/97
- W. Satellite imagery, dated 10/5/97
- X. Satellite Imagery, dated 7/30/05
- Y. Satellite Imagery, dated 8/02/11
- Z. Satellite imagery, dated 3/18/16

With the exception of Section D – Records of Water Use at the Tinaja Pit Mine – copies of the foregoing documents and/or tangible items are provided with these Initial Disclosures. The records in Section D are available for inspection and copying at the offices of Law & Resource Planning Associates, 201 Third Street NW, Suite 1750, Albuquerque, New Mexico 87102.

Defendant Norma M. Meech, individually and as successor-in-interest to Defendant Walter V. Meech, reserves the right to identify any other witnesses and/or exhibits that are revealed during discovery in this matter.

Respectfully submitted,

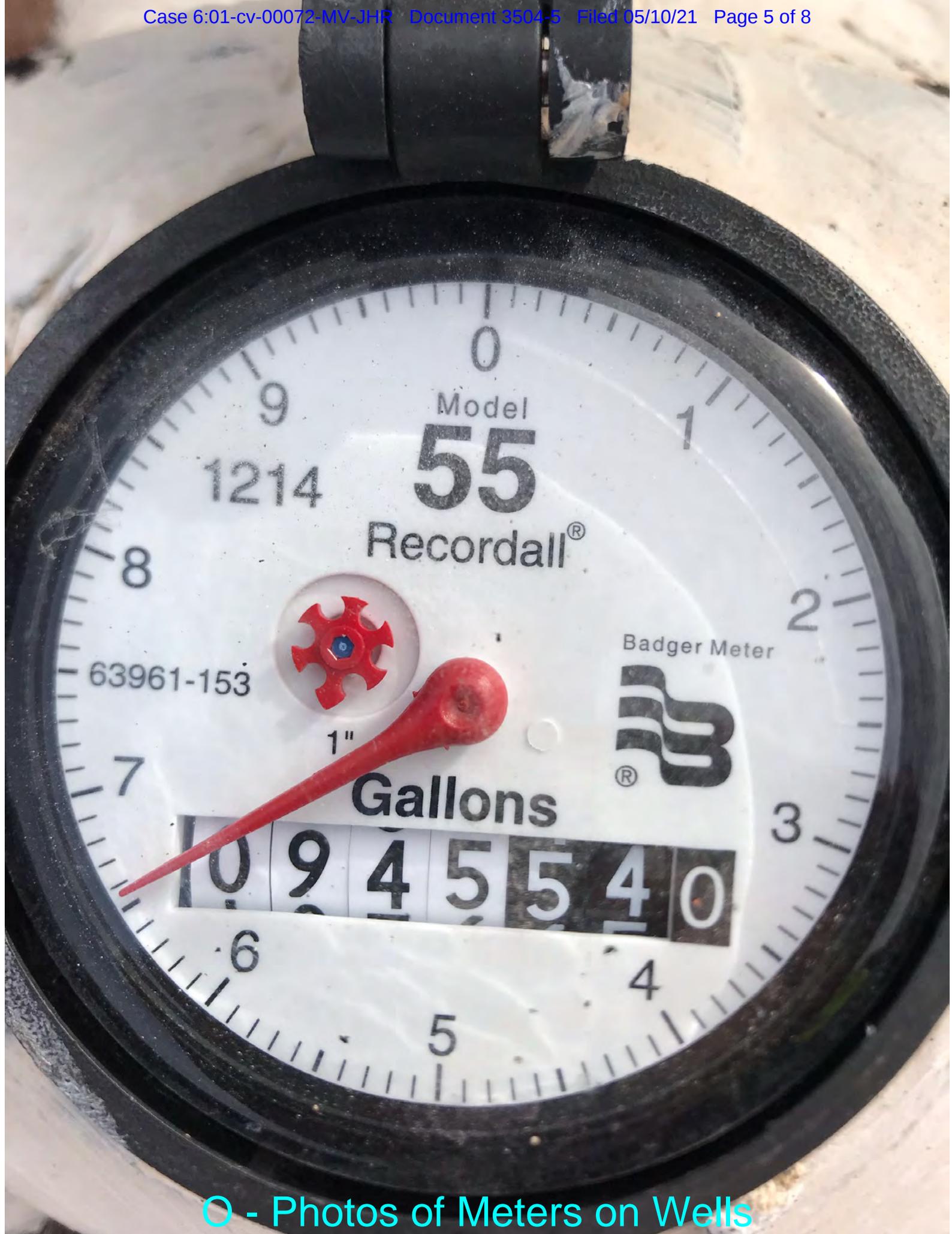
LAW & RESOURCE PLANNING ASSOCIATES,
A Professional Corporation

By: 
Tanya L. Scott
Attorney for Defendant
Albuquerque Plaza, 201 3rd Street NW, Ste. 1750
Albuquerque, NM 87102
(505) 346-0998 / FAX: (505) 346-0997

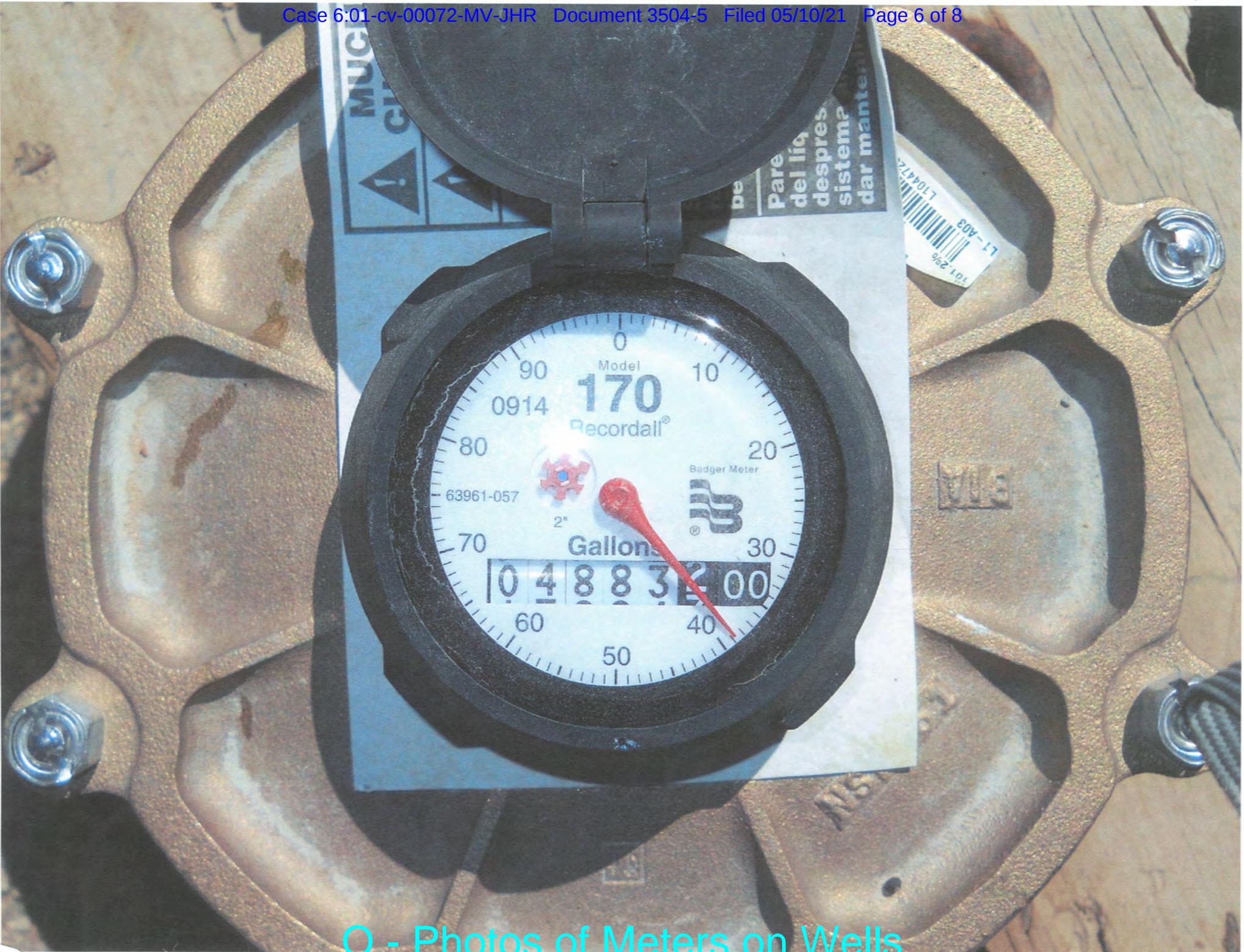
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 29, 2020, I filed the foregoing pleading electronically through the CM/ECF system, which caused the parties or counsel reflected on the Notice of Filing to be served by electronic means.

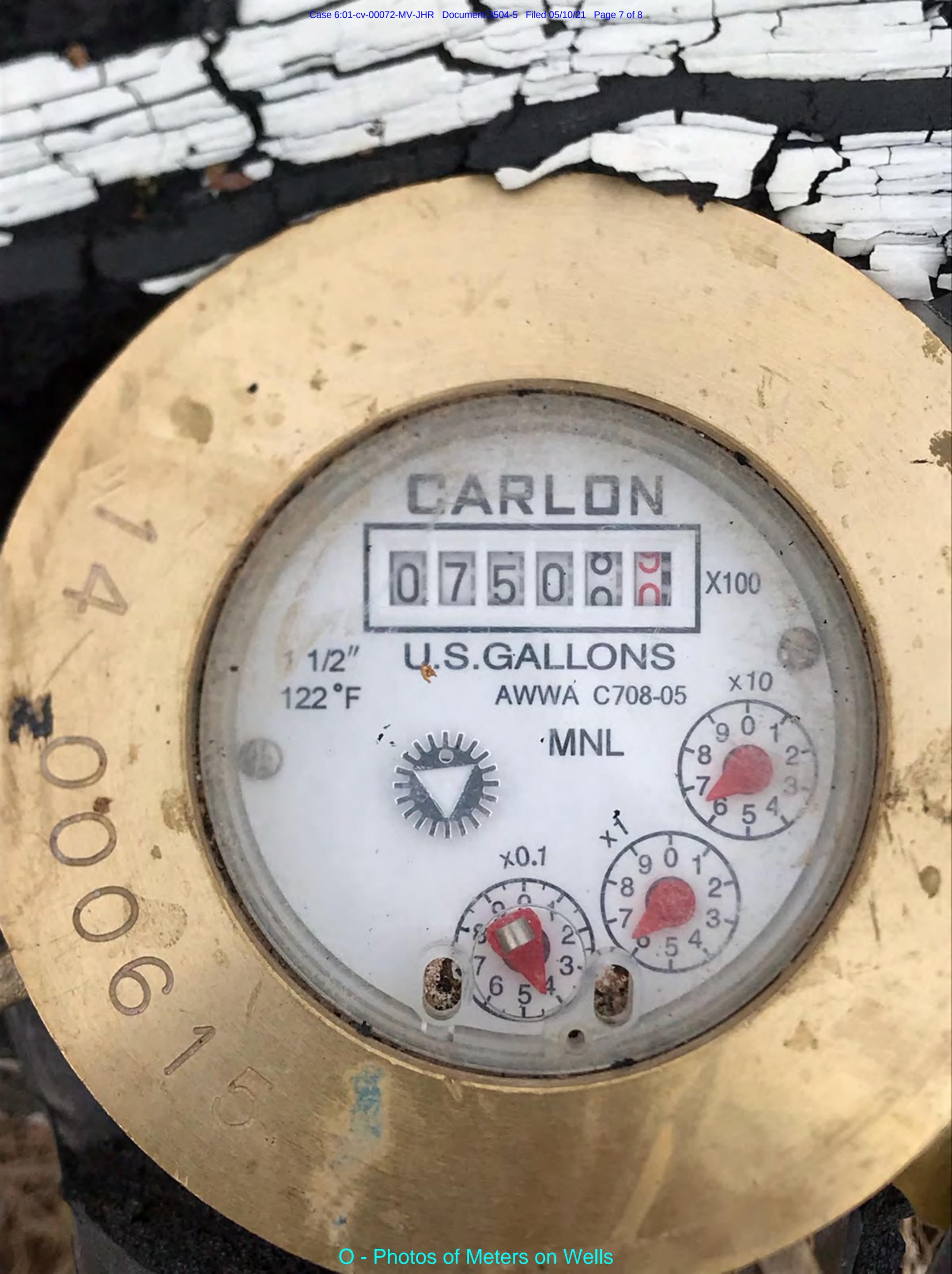

Tanya L. Scott



O - Photos of Meters on Wells



O - Photos of Meters on Wells



CARLON

075000

X100

1/2"
122°F

U.S. GALLONS

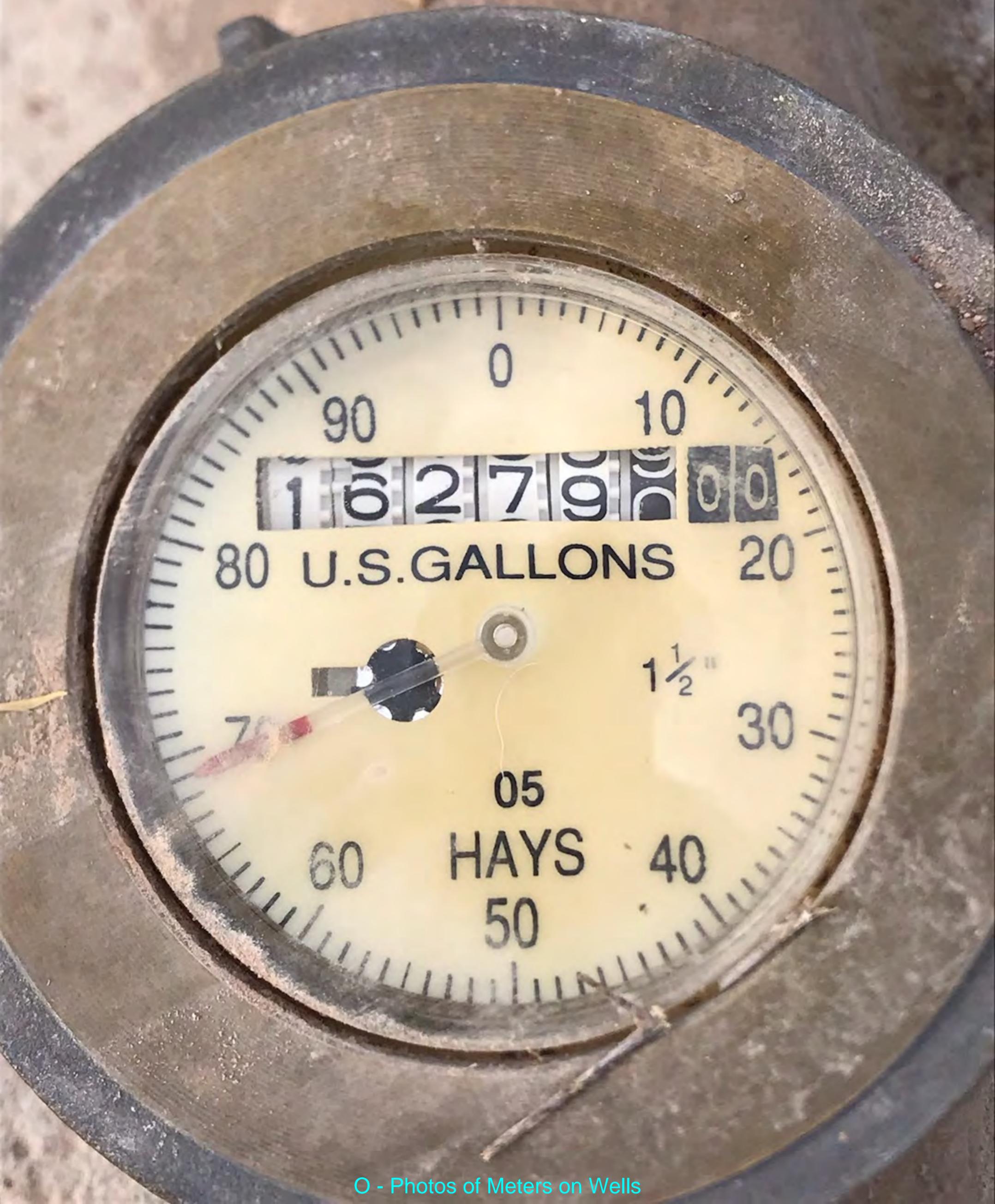
AWWA C708-05

x10

MNL



414000615



O - Photos of Meters on Wells