

FIFTH JUDICIAL DISTRICT
COUNTY OF CHAVES
STATE OF NEW MEXICO

STATE OF NEW MEXICO, <i>ex rel.</i>)	Nos. 20294 and 22600
STATE ENGINEER)	Consolidated
AND PECOS VALLEY ARTESIAN)	
CONSERVANCY DISTRICT,)	Hon. James J. Wechsler
)	Judge <i>Pro Tempore</i>
Plaintiffs,)	
v.)	Pecos River Stream System
)	Cow Creek Section
L.T. LEWIS, <i>et al.</i> , and)	
THE UNITED STATE OF AMERICA,)	Case No. D-504-WS-19000001
)	
Defendants.)	

CLAIM TO SURFACE WATER RIGHTS

COMES NOW FDR Properties, Ltd., a Texas Limited Partnership, formerly known as Enchanted Properties, Ltd., by and through its counsel of record, Sommer Udall Law Firm, P.A., (Kurt A. Sommer and Gary J. Coffin), and hereby makes a claim to surface water rights. In support, FRD Properties, Ltd. states as follows:

1. FDR Properties, Ltd., submits this claim to any and all surface water rights whether or not depicted or described in the 2015 Cow Creek Watershed Hydrographic Survey.
2. FDR Properties, Ltd., is formerly known as Enchanted Properties, Ltd. and can be notified by and through undersigned counsel.
3. FDR Properties, Ltd., is uncertain of the Priority date, source of water, amount of water, purpose of use, period of use, place of use, place or point of diversion, and number of irrigated tracts. However, FDR Properties, Ltd., does not wish to waive any surface water rights.

Respectfully Submitted,

SOMMER UDALL LAW FIRM, P.A.
Attorneys for FDR Properties, Ltd.

By: /s/ Gary J. Coffin

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was submitted for e-filing through the Court's e-file and serve system, which caused a true and correct copy to be served upon all counsel of record on the date of acceptance for filing as a mechanism of such filing.

/s/ Gary J. Coffin

Gary J. Coffin