

1 John B. Weldon, Jr., 003701
2 Lisa M. McKnight, 011638
3 Michael K. Foy, 032736
4 **SALMON, LEWIS & WELDON, P.L.C.**
5 2850 East Camelback Road, Suite 200
6 Phoenix, Arizona 85016
7 (602) 801-9060
8 jbw@slwplc.com
9 lmm@slwplc.com
10 mkf@slwplc.com

11 *Attorneys for Salt River Project Agricultural*
12 *Improvement and Power District and Salt River*
13 *Valley Water Users' Association*

RECEIVED
MAR 09 2016
LEGAL
DEPT OF WATER RESOURCES

14 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
15 **IN AND FOR THE COUNTY OF MARICOPA**

16 IN RE: THE GENERAL
17 ADJUDICATION OF ALL RIGHTS
18 TO USE WATER IN THE GILA
19 RIVER SYSTEM AND SOURCE

No. W-1 (Salt)
No. W-2 (Verde)
No. W-3 (Upper Gila)
No. W-4 (San Pedro)

Contested Case No. W1-11-605

**SALT RIVER PROJECT'S
SUPPLEMENTAL DISCLOSURE
STATEMENT FOR SECOND PHASE
OF THIS CASE**

(Assigned to the Hon. Mark H. Brain)

20 Contested Case Name: *In re Fort Huachuca.*

21 HSR Involved: San Pedro River Watershed Hydrographic Survey Report.

22 Descriptive Summary: The Salt River Project submits its supplemental disclosure
23 statement in the second phase of *In Re Fort Huachuca.*

24 Date of Filing: March 7, 2016.

25 Number of Pages: 4 (no attachments).

26 The Salt River Valley Water Users' Association and the Salt River Project Agricultural
27 Improvement and Power District (collectively, "SRP") hereby submit this supplemental

1 disclosure statement pursuant to the Special Master's Order Designating Issues for
2 Consideration and Setting Schedule for Second Phase of This Case, dated December 19, 2011
3 ("Order"), and the Special Master's Order Regarding Discovery and Disclosure Statements,
4 dated December 2, 2015 ("Discovery Order").

5 **I. ISSUES DESIGNATED FOR CONSIDERATION**

6 As provided in the Order, SRP's supplemental disclosure statement is limited to matters
7 concerning the following three designated issues:

- 8 A. What is in detail the scope of water uses encompassed by the term "military
9 purposes?"
- 10 B. What is the quantity of water reserved to fulfill the military purposes?
- 11 C. Are sources of water other than groundwater adequate to accomplish the military
12 purposes, and, if not, what is the quantity of groundwater required to accomplish
those purposes?

13 *See Order, at 3-4.*

14 **II. SUPPLEMENTAL DISCLOSURE STATEMENT**

- 15 **A. List the names, addresses and telephone numbers of any witnesses whom**
16 **the disclosing party expects to call with a fair description of the substance**
17 **of each witness' expected testimony.**

18 SRP does not expect to call any witnesses at trial in this matter. SRP expressly
19 reserves the right to examine any witness called by any other party in this matter and to raise
20 arguments based on the testimony provided by any such witnesses.

- 21 **B. List the names and addresses of all persons whom the disclosing party**
22 **believes may have knowledge or information relevant to the events,**
23 **transactions or occurrences that gave rise to each claim and the nature of**
24 **the knowledge or information each such individual is believed to possess.**

25 SRP incorporates by reference as if fully set forth herein the names, contact
26 information, and descriptions set forth in Sections a, b, and d of the United States'
27 Supplemental Disclosure for Second Phase of Contested Case No. W1-11-605, dated January

1 27, 2016 (the "U.S. Supplement"). SRP also incorporates by reference as if fully set forth
2 herein any individual identified in any supplemental disclosure statement that any party files
3 in response to the Discovery Order.

4 **C. List the names and addresses of all persons who have given statements,**
5 **whether written or recorded, signed or unsigned, and the custodian of the**
6 **copies of those statements.**

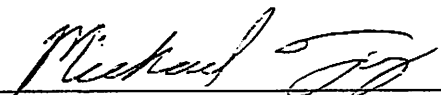
7 Other than the statements provided by the deponents whose depositions have been
8 taken in this matter, SRP is unaware of the existence of any written or recorded statements.
9 To the extent any such statements exist, the statements currently are not within SRP's
10 possession, custody, or control.

11 **D. List the name and address of each person whom the disclosing party**
12 **expects to call as an expert witness, the subject matter on which the expert**
13 **is expected to testify, the substance of the facts and opinion on which the**
14 **expert is expected to testify, a summary of the grounds for each opinion, the**
15 **qualification of the witness and the name and address of the custodian of**
16 **copies of any reports prepared by the expert.**

17 SRP does not intend to call any expert witnesses at trial in this matter. SRP expressly
18 reserves the right to examine any expert witness called by any other party in this matter and to
19 raise arguments based on the testimony provided by any such expert witnesses.

20 DATED this 7th day of March, 2016.

21 SALMON, LEWIS & WELDON, P.L.C.

22 By 

23 John B. Weldon, Jr.

24 Lisa M. McKnight

25 Michael K. Foy

26 2850 East Camelback Road, Suite 200

27 Phoenix, Arizona 85016

Attorneys for SRP

1 Original and one copy of the foregoing
2 hand-delivered this 7th day of March, 2016 to:

3 Clerk of the Superior Court
4 Maricopa County
5 Attn: Water Case
6 601 West Jackson Street
7 Phoenix, AZ 85003

8 One copy of the foregoing hand-delivered
9 this 7th day of March, 2016 to:

10 Hon. Mark H. Brain
11 Judge of the Superior Court
12 Central West Building, Suite 12A
13 201 West Jefferson Street
14 Phoenix, AZ 85003

15 Susan Ward Harris
16 Special Master
17 Central Court Building, Suite 3A
18 201 West Jefferson Street
19 Phoenix, AZ 85003

20 Copies of the foregoing mailed this 7th day of
21 March, 2016 to all persons appearing on the court-approved
22 mailing list for W1-11-605 dated February 24, 2016.

23
24
25
26
27
By: 