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10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

11 **IN AND FOR THE COUNTY OF MARICOPA**

12 IN RE: THE GENERAL
13 ADJUDICATION OF ALL RIGHTS
14 TO USE WATER IN THE GILA
15 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. W1-11-232

**FREEPORT MINERALS
CORPORATION'S SECOND
SUPPLEMENTAL DISCLOSURE
STATEMENT**

(Assigned to the
Honorable Mark H. Brain)

16 CONTESTED CASE NAME: *In re San Pedro Riparian National Conservation Area*

17 DESCRIPTIVE SUMMARY: Freeport Minerals Corporation submits its second
18 supplemental disclosure statement.

19 NUMBER OF PAGES: 4

20 STATEMENT OF CLAIMANT NOS: 39-02297 *et al.* (numerous claims)

21 DATE OF FILING: August 19, 2016.

1 Pursuant to the Special Master’s June 14, 2016 Order Regarding Supplemental
2 Disclosure Statements and Deposition Schedules, Freeport Minerals Corporation
3 (“Freeport”) submits its Second Supplemental Disclosure Statement for this contested
4 case regarding the Federal Government’s claimed federal reserved rights for the San
5 Pedro Riparian National Conservation Area (“SPRNCA”). The disclosures set forth
6 below supplement Freeport’s January 14, 2014 Initial Disclosure Statement and Freeport’s
7 July 29, 2016 First Supplemental Disclosure Statement. Discovery is ongoing, and
8 Freeport expressly reserves the right to supplement and amend its disclosures.

9 **1. FACTUAL BASIS OF THE CLAIMS AND DEFENSES**

10 Supplementing prior disclosures, Freeport expressly incorporates the contents of
11 each of the expert reports disclosed by Freeport on July 29, 2016 and authored by Richard
12 Burtell, Amy Hudson, Steve Carothers, and Christopher Garrett.

13 Freeport expressly reserves the right to supplement and amend this disclosure
14 throughout discovery.

15 **3. WITNESSES WHOM THE DISCLOSING PARTY EXPECTS TO**
16 **CALL AT TRIAL**

17 Supplementing prior disclosures, Freeport discloses the following witness:

- 18 1. Cochise County Supervisor or Representative
19 Contact Information To be Determined

20 A supervisor for or representative of Cochise County may testify regarding the
21 potential for residential, commercial, or industrial growth and development within
22 Cochise County. This witness is expected to testify consistent with any deposition
23 testimony and / or statements that he or she provides in this case. Freeport is in the
24 process of identifying this witness and will supplement its disclosures with additional
25 information as it becomes available.

26 Freeport discloses that it reserves the right to call any witness designated by any

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party as an expert witness or a non-expert witness.

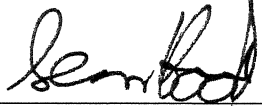
Freeport reserves the right to call any witness to testify at trial for purposes of authenticating any exhibit, to provide foundation, to impeach another witness's testimony, or to provide rebuttal testimony, and Freeport expressly reserves the right to supplement and amend this disclosure.

DATED this 19th day of August, 2016.

SNELL & WILMER L.L.P.

L. William Staudenmaier
Attorneys for Freeport Minerals Corporation

FENNEMORE CRAIG, P.C.

By 
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1 ORIGINAL of the foregoing filed
2 this 19th day of August, 2016 with:

3 Clerk of Maricopa County Superior Court
4 Attn: Water Case
5 601 West Jackson Street
6 Phoenix, Arizona 85003-2205

7 COPY hand-delivered this 19th day of August, 2016 to

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

13 Susan Ward Harris
14 Special Master
15 Central Court Building, Ste 3A
16 201 West Jefferson
17 Phoenix, AZ 85003-2205

18 COPY mailed this 19th day of August, 2016 to
19 all persons appearing on the Court-
20 approved mailing list in W1-11-2664 dated
21 June 14, 2016

22 By: Kathy Power

23 11942250

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