

RECEIVED

Pamela Jones

By Water Quality Control Commission at 2:58 pm, Oct 14, 2025

**STATE OF NEW MEXICO
WATER QUALITY CONTROL COMMISSION**

**IN THE MATTER OF PROPOSED
AMENDMENTS TO 20.6.8 NMAC -
*Ground and Surface Water Protection -
Supplemental Requirements
For Reuse of Treated Produced Water***

No. WQCC 25-34 (R)

The Water Access, Treatment & Reuse Alliance,

PETITIONER.

**MAXWELL'S RESPONSE TO THE MOTION TO DISQUALIFY BY
AMIGOS BRAVOS, SIERRA CLUB, AND WELC**

Mr. Maxwell, having reviewed the Motion to Disqualify filed by Amigos Bravos, Sierra Club, and Western Environmental Law Center, states as follows:

1. Sufficient grounds exist to disqualify Commissioner Kenney from participation in this matter.
2. The movants have not presented sufficient grounds to warrant disqualification of any other Commissioners or Cabinet Secretaries.
3. Designees, including Commissioner Kenney's, should not be disqualified in this matter as requested, as the Commission retains authority to disqualify any designee.
4. Any and all other relief requested by movants should be denied.

Respectfully submitted,

By: *-s- Nicholas Maxwell*
Mr. Nicholas R. Maxwell
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Hobbs, New Mexico 88241
Telephone: (575) 441-3560
Email: inspector@sunshineaudit.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of my response was served by email on October 13, 2025 to all parties of record, with a hard copy mailed upon request.

-s- Nicholas R. Maxwell
Mr. Nicholas R. Maxwell