

STATE OF NEW MEXICO  
BEFORE THE 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)

Water Access Treatment & Reuse Alliance,  
Petitioner.

**WETHERBEE’S RESPONSE TO AMIGOS BRAVOS, SIERRA CLUB, AND WESTERN  
ENVIRONMENTAL LAW CENTER’S MOTION TO DISQUALIFY SEVEN  
COMMISSIONERS AND THEIR DESIGNEES AND VACATE COMMISSION VOTE  
GRANTING WATR’S REQUEST FOR HEARING**

Having reviewed the Motions filed by Amigos Bravos, Sierra Club, and Western Environmental Law Center (“WELC”) to Disqualify Seven Commissioners and their Designees and to vacate the Water Quality Control Commission’s (WQCC) vote which granted the Water Access Treatment & Reuse Alliance (WATR), Bruce Wetherbee writes as follows:

Wetherbee concurs with the moving parties’ contention that while the Governor of New Mexico (Governor) has authority to establish policy for executive agencies of state government, there is an expectation that the Water Quality Control Commissioners shall decide on matters properly before them with independence.

In support of full disclosure and transparency, Wetherbee further concurs with the moving parties’ motion to disqualify at least seven commissioners and their designees from participating in this matter, and further concurs with the motion to vacate the WQCC vote to grant a hearing as requested by WATR.

Respectfully Submitted,

By: /s/ Bruce Wetherbee  
Bruce Wetherbee  
60 Thoreau Street # 103  
Concord, Massachusetts 01742

[editor@thecandlepublishing.com](mailto:editor@thecandlepublishing.com)  
(505) 501-1570

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of my entry of appearance was served by electronic email on Monday, October 13, 2025, to the persons listed below:

Pamela Jones  
Commission Administrator  
1190 Saint Francis Drive, Suite S2102  
Santa Fe, New Mexico 87505  
[Pamela.jones@state.nm.us](mailto:Pamela.jones@state.nm.us)

Nicholas Maxwell  
P.O. Box 1064  
Hobbs, New Mexico 88241  
[inspector@sunshineaudit.com](mailto:inspector@sunshineaudit.com)

Jennifer Bradfute  
Matthias Sayer  
Bradfute Consulting & Legal Services d/b/a  
Bradfute Sayer P.C.  
P.O. Box 90233  
Albuquerque, New Mexico 87199  
[jennifer@bradfutelaw.com](mailto:jennifer@bradfutelaw.com)  
[matthias@bradfutelaw.com](mailto:matthias@bradfutelaw.com)

Adam Rankin  
Cristina Mulcahy  
Lila C. Jones  
Holland and Hart, LLP  
110 North Guadalupe, Suite 1  
Santa Fe, New Mexico 87501  
[AGRankin@hollandhart.com](mailto:AGRankin@hollandhart.com)  
[CAMulcahy@hollandhart.com](mailto:CAMulcahy@hollandhart.com)  
[LCJones@hollandhart.com](mailto:LCJones@hollandhart.com)

Colin Cox  
Gail Evans  
The Center for Biological Diversity  
1025 ½ Lomas NW  
Albuquerque, New Mexico 87102  
[ccox@biologicaldiversity.org](mailto:ccox@biologicaldiversity.org)  
[gevans@biologicaldiversity.org](mailto:gevans@biologicaldiversity.org)

Jolene L. McCaleb  
Elizabeth Newlin Taylor  
Taylor & McCaleb, P.A.  
P.O. Box 2540  
Corrales, New Mexico 87048-2540  
[jmccaleb@taylormccaleb.com](mailto:jmccaleb@taylormccaleb.com)  
[etaylor@taylormccaleb.com](mailto:etaylor@taylormccaleb.com)

Mariel Nanasi  
Senior Attorney and Executive Director  
New Energy Economy  
422 Old Santa Fe Trail, Santa Fe, NM 87501  
[MNanasi@NewEnergyEconomy.org](mailto:MNanasi@NewEnergyEconomy.org)

Jeffrey J. Wechsler  
Kari E. Olson  
Sharon T. Shaheen  
Spencer Fane, LLP  
P.O. Box 2307  
Santa Fe, New Mexico, 87504  
[jwechsler@spencerfane.com](mailto:jwechsler@spencerfane.com)  
[kaolson@spencerfane.com](mailto:kaolson@spencerfane.com)  
[sshaheen@spencerfane.com](mailto:sshaheen@spencerfane.com)

Tannis Fox  
Senior Attorney  
Western Environmental Law Center  
409 East Palace Avenue, Suite 2  
Santa Fe, New Mexico 87501  
505.629.0732 [fox@westernlaw.org](mailto:fox@westernlaw.org)  
[Mario Atencio mpatencio@gmail.com](mailto:Mario Atencio mpatencio@gmail.com)  
[Daniel Tso detso49@gmail.com](mailto:Daniel Tso detso49@gmail.com)

Felicia Orth  
Commission Administrator  
1190 Saint Francis Drive, Suite S2102

Santa Fe, New Mexico 87505  
Felicia.l.orth@gmail.com

Eduardo Ugarte, II  
Assistant Attorney General  
New Mexico Department of Justice  
P.O. Box 1508  
Santa Fe, New Mexico 87504  
eugarte@nmdoj.gov

Tim Davis  
WildEarth Guardians  
301 North Guadalupe St.  
Ste. 201  
Santa Fe, NM 87501  
(205) 913-6425  
tdavis@wildearthguardians.org

Jose Anguamea Lorenzo Villegas, Sr.  
El Valle De La Cieneguilla Land Grant  
10 Camino Torcido Loop  
Santa Fe, New Mexico 87507  
caselda2010@hotmail.com

By: /s/ Bruce Wetherbee  
Bruce Wetherbee