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New Mexico Environment Department Surface Water Quality Bureau

Standard Operating Procedure for a

TECHNICAL SYSTEM AUDIT

Approval Signatures

Miguel Montoya
Subject Matter Expert

March 28, 2022

Date

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March 28, 2022

Date

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1.0 Purpose and Scope

Establishing and implementing an effective audit and assessment program is an integral part of a quality system. A Technical System Audit (“TSA”) provides management with information that is needed to evaluate and improve an organization's operation, including:

- the organizational progress in reaching strategic goals and objectives,
- the adequacy and implementation of projects developed to achieve the mission,
- the quality of products and services, and
- the degree of compliance with contractual and regulatory specifications.

This Standard Operating Procedure (“SOP”) was developed to describe technical system audit and assessment procedures and explains in detail how a TSA will be conducted for the various projects New Mexico Environment Department (“NMED”) Surface Water Quality Bureau (“SWQB”) works under. The purpose of this SOP is to establish and describe the implementation of the TSA’s key elements, which have been broken down into the following sections: prioritizing and frequency, notification and coordination, document review and TSA checklist development, TSA checklist evaluation, observations and interview, and assessment report and corrective action.

2.0 Personnel Responsibilities

The SWQB Chief has final approval authority for the development and revision of this SOP. The SWQB Chief or their designee is required to have, or be seeking, an U.S. Environmental Protection Agency (“EPA”) certificate for Quality Project & Program Management or equivalent and will ensure the SWQB Quality Assurance Officer (“QAO”) conducts the TSA according to this SOP. The Chief or designee will regularly evaluate the QAO’s performance.

The QAO is responsible for conducting TSAs for projects implemented by the NMED SWQB in accordance with the most recent EPA-approved version of the SWQB *Quality Management Plan for Environmental Operations*. The QAO is required to have, or be seeking, an EPA certificate for Quality Project & Program Management or equivalent. The QAO is responsible for the development and revision of this SOP and ensuring the SOP meets the requirements of EPA policies and regulations, the SWQB *Quality Management Plan for Environmental Data Operations*, the SWQB *Quality Assurance Project Plan for Water Quality Management Programs* and applicable SWQB SOPs. The QAO is responsible for making this SOP accessible through the SWQB's secured server and the publicly accessible website. The QAO will review and determine if any revisions to this SOP are needed in accordance with the most recent version of the SWQB *SOP 1.1 Creation and Maintenance of SOPs*. If needed the QAO will request guidance from the SWQB Chief or designee when revisions and updates are needed to this SOP.

The immediate Supervisor (i.e., Team Supervisor, Program Manager, Bureau Chief) to the Project Manager will be responsible for the administrative oversight and quality of a project in which their personnel are responsible.

The Project Manager is responsible for the quality of the project, providing the QAO with most up-to-date quality assurance project planning documents, coordinating with the QAO throughout TSA, and implementing corrective actions to address deficiencies and/or findings.

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The Subject Matter Expert (“SME”) for this SOP is the QAO. The SME is accountable for all tasks and responsibilities associated with the QAO’s position.

All SWQB personnel will be familiar and abide by the procedures as detailed in this SOP and sign the acknowledgment statement associated with this SOP.

3.0 Background and Precautions

3.1 Background

The EPA bases its quality system on *Quality Management Systems for Environmental Information and Technology Programs* (ANSI/ASQ E4-2014), which was developed by the American National Standards Institute (“ANSI”) and the American Society for Quality (“ASQ”). According to ANSI/ASQ E4-2014, assessments of projects should be conducted periodically, and the assessments deficiencies and findings should be evaluated to measure the effectiveness of the project’s quality systems. Because the SWQB is funded by EPA and SWQB decisions rely on the quality of environmental data to make decisions, it is imperative that the effectiveness of the quality system that supports the collection and use of environmental data be periodically audited and assessed.

A TSA is a systematic and objective examination of a project to determine whether requirements such as, but not limited to, polices and regulations, project management, data generation and acquisition, assessment and oversight, and data validation and usability comply with quality assurance project planning documents. The TSA determines if projects are being implemented effectively and are suitable to achieve their data quality goals stated in quality assurance planning documents.

3.2 Procedural Precautions

Typically the QAO will perform a TSA for the SWQB, however EPA Region 6 Quality Manager or their designee has the ability to initiate a Quality Systems Audit, Management System Review, or a TSA of the NMED SWQB.

The QAO conducts TSAs for those activities and projects to which the QAO is not directly involved in performing or managing to ensure the QAO is removed from bias and influences that could affect objectivity. The SWQB documents the independence of the QAO from SWQB sections which generate environmental data in the bureau’s *Quality Management Plan for Environmental Data Operations*.

3.3 Safety Precautions

This SOP does not cover actions or procedures that may pose specific safety issues beyond those found in a typical office environment. When a TSA is performed on a project which poses a safety concern, the project’s planning documents should describe in detail any safety precautions.

4.0 Definitions

Assessment report – a document that serves as a comprehensive record for the TSA and summarizes the deficiencies and findings observed during the TSA. The report also states any corrective actions needed based on TSA discoveries.

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Comprehensive Assessment Listing Methodology (“CALM”) – a quality assurance project planning document that provides the procedures for assessing water quality standards (20.6.4 NMAC) attainment for the State of New Mexico CWA §303(d)/§305(b) Integrated Report. For purposes of this SOP, the CALM is considered an SOP.

Corrective action – action taken to eliminate the causes of existing nonconformance to quality assurance project planning documents, which include deficiency, finding or other undesirable situation, in order to prevent recurrence.

Deficiency – a statement based on the lack of requirements (e.g., specific criteria or procedures) in quality assurance project planning documents essential to a project quality system so that project objectives can be met.

Environmental data (“data”) – any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology. For EPA and the NMED SWQB, environmental data include information collected directly from measurements, produced from models, and compiled from other sources such as databases or literature.

Environmental technology – used to describe pollution control devices and systems, waste treatment processes and storage facilities, and site remediation technologies and their components that may be used to remove pollutants or contaminants from, or to prevent them from entering, the environment.

Finding – a statement based on evidence observed during the TSA that indicates noncompliance with requirements (e.g., specific criteria or procedures) stated in quality assurance project planning documents. A finding also includes the absence of quality assurance project planning documents required by policy or regulation.

Field Sampling Plan (“FSP”) – a quality assurance project planning document that serves as the comprehensive record for each individual project.

Hydrology Protocol – a quality assurance project planning document that serves as the survey method used to determine the hydrologic regime of a waterbody. The method is specified under Appendix C of the Water Quality Management Plan/Continuing Planning Process and is approved by the Water Quality Control Commission and EPA Region 6. For purposes of this SOP, the Hydrology Protocol is considered an SOP.

Program Manager – an individual within the SWQB that manages a program such as the Watershed Protection Section (“WPS”), the Point Source Regulation Section (“PSRS”) or the Monitoring, Assessment and Standards Section (“MASS”). The Program Manager and Project Manager are not necessarily synonymous.

Project – work or activities being conducted by SWQB, which involves environmental data that may be used for decision making such as characterization of environmental processes and conditions; environmental monitoring; environmental research and development; design, construction, and

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operation of environmental technologies; and laboratory operations on environmental samples.

Project Manager – an individual responsible for a specific project being conducted by or for the SWQB. This individual holds different title(s) and responsibilities within the organization that extend beyond a Project Manager’s duties for this SOP.

Quality assurance project planning documents (“planning documents”) – any document that outlines a process or series of processes that ensure quality assurance and quality control as it pertains to the project (e.g., Water Quality Management Plan/Continuing Planning Process, Quality Management Plan, Quality Assurance Project Plan, Standard Operating Procedure, Field Sampling Plan, Sampling Analysis Plan, Comprehensive Assessment and Listing Methodology, Hydrology Protocol and National Pollutant Discharge Elimination System Compliance Inspection Manual).

Quality Assurance Officer (“QAO”) – an individual within the SWQB that is responsible for overseeing the development and implementation of the quality system and the quality assurance procedures and processes associated with the quality system within the SWQB including those projects that receive support or funding from the SWQB.

Quality Assurance Project Plan (“QAPP”) – a planning document for an environmental data collection operation that describes the procedures and the necessary quality assurance and quality control activities that must be implemented to ensure that the results are sufficient and adequate to satisfy the stated performance criteria.

Quality Management Plan (“QMP”) – a project planning document that describes how an organization structures its quality system and describes its quality policies and procedures, criteria for and areas of application, and roles, responsibilities, and authorities. It also describes an organization’s policies and procedures for implementing and assessing the effectiveness of the quality system.

Quality System – a structured system that describes the policies and procedures for ensuring that work processes, products, or services satisfy stated expectations or specifications is called a quality system.

Standard Operating Procedure (“SOP”) – a planning document that details the method for an operation, analysis, or action with thoroughly prescribed techniques and steps; a procedure that is officially approved as the method for performing certain routine or repetitive tasks.

Sampling Analysis Plan (“SAP”) – a planning document that details the procedural and analytical requirements for a one-time or time-limited project. A SAP must meet the quality requirements for any project funded by the EPA under which environmental measurements are to be taken.

Subject Matter Expert (“SME”) – a person who is familiar with the purpose and procedures for accomplishing a task. For this SOP, the SME is the same individual as the QAO.

Surface Water Quality Bureau (“SWQB”) – a bureau under the Water Protection Division of the New Mexico Environment Department. The SWQB’s mission is to preserve, protect, and improve New Mexico’s surface water quality for present and future generations. Sections managed by Program Managers under the SWQB include the WPS, PSRS, MASS.

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Surface Water Quality Information Database (“SQUID”) – The SWQB database for storing, retrieving and reporting environmental results, which include laboratory results, field observations, biologic assemblage data, long-term datasets (LTD) summary data, stream habitat/geomorphic data and their associated monitoring locations.

Technical systems audit (“TSA”) – a systematic and objective examination of an environmental program to determine whether its activities and related results comply with planning documents. A TSA qualitatively documents the degree to which the procedures and processes specified in the approved planning documents are being implemented.

TSA Checklist – a document that serves as a comprehensive record for a TSA. The checklist is used to document deficiencies and findings observed during the TSA.

Team Supervisor – a person within the SWQB who coordinates and manages personnel and is responsible for specific long-term projects within the SWQB. A Team supervisor reports to their respective Program Manager and is responsible for verifying that all environmental data activities (collection, storage, and management) related to the project comply with the provisions of the SWQB’s planning documents.

Water Quality Management Plan/Continuing Planning Process (“WQMP/CPP”) – The NMED’s Statewide WQMP/CPP provides a concise summary of the water quality management system in New Mexico and the roles of the major participants in that system as required by Sections 208 and 303 of the federal Clean Water Act and Section 74-6-4.B of the New Mexico Water Quality Act.

5.0 Equipment and Tools

Access to SWQB planning documents, the NMED SWQB network drive, SQUID, and Microsoft Office (or equivalent).

6.0 Step-by-step Process Description

A TSA will be used to review, observe, and evaluate environmental projects of the NMED SWQB. A TSA plays an important role in documenting the implementation of quality assurance project planning documents (“planning documents”) and is used to evaluate whether requirements in planning documents are being met. Requirements established in planning documents will be used to develop a TSA checklist for the TSA. Through the evaluation of the TSA checklist, the QAO will be able to determine if SWQB environmental projects are conducted as planned and are producing data of the type and quality specified.

The QAO utilizes an assessment report to inform the Project Manager, Team Supervisors, and Program Manager of deficiencies and/or findings and required corrective actions identified during the TSA process. The SWQB Chief will be notified of deficiencies and/or findings on a case-by-case basis. More information is detailed in the Corrective Action section of this SOP. The objective of a TSA is to serve as an informational report for management purposes in order to evaluate and improve SWQB’s operation. The TSA procedure will typically follow the process stated in sections 6.1 through 6.6.

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6.1 Prioritizing and Frequency

The QAO plans to conduct a TSA on every SWQB project funded by the EPA at least once during the lifetime of the project. Projects are not limited to those conducted by SWQB personnel but also include projects conducted by entities or individuals working under the direct oversight of SWQB personnel and those projects funded through a contract, memorandum of agreement or memorandum of understanding with the SWQB. If the deficiencies and/or findings affect the quality of data, integrity of data, or are problematic for operations then a corrective action will be implemented to resolve the problem. Prioritization and frequency of future TSAs is directly dependent of the severity of the deficiencies and/or findings discovered through the TSA process.

6.2 Notification and Coordination

The QAO will notify the Project Manager that a TSA is to be performed. The QAO will request from Project Manager the most up-to-date planning documents applicable to the TSA. The Project Manager has ten (10) business days to deliver (electronically or hard copy) the planning documents to the QAO. If the Project Manager is unable to produce the planning documents within the allowable time, a finding will be recorded and the TSA will proceed with the most up-to-date planning documents available on the SWQB webpage, the SWQB secured server, or hard copies filed with the QAO.

The QAO will establish an agenda for the TSA. The agenda will contain a proposed schedule that details dates and times for key elements of the TSA, such as interviews with Project Manager and field observation days. The QAO will provide the agenda to the Project Manager with proposed dates and times via email. If needed, the Project Manager will respond via email proposing alternate dates and times within five (5) business days of receiving agenda. Once the dates and times have been determined, the interview and field observation day(s) will be scheduled with the appropriate personnel to successfully capture the implementation of the project in accordance with the planning documents. However, it is acknowledged that the actual timing of audit activities may vary from the agenda due to unforeseen changes in project schedules or the need for more extensive discussion of specific TSA items. Field observations can be excluded from the TSA at the discretion of the QAO.

6.3 Document Review and TSA Checklist Development

The document review process provides the opportunity for the QAO to become familiar with the requirements detailed in the planning documents utilized by a project. The QAO will obtain as much information available so that the QAO may construct a TSA checklist that captures the requirements detailed in the planning documents. The TSA checklist provides a method for the QAO to document information for determining deficiencies and/or findings. A generic checklist has been developed to provide personnel with a general idea of the structure and content of a TSA checklist (Appendix A).

6.4 Evaluation of TSA Checklist

The TSA checklist evaluation requires the QAO to compare project implementation to the requirements listed in the TSA checklist. The QAO documents information discovered through the TSA checklist evaluation process in the notes section to determine if deficiencies and/or findings occurred during the TSA. The QAO records and assesses information from the interview and observation of field activities using the TSA Checklist. The QAO records findings when evidence observed during the TSA indicate noncompliance relative to implementation of requirements stated by planning documents. A finding

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also includes the absences of planning documents required by policy or regulation. The QAO records deficiencies when there is a lack of requirements in planning documents essential to the project's quality system. The QAO will mark the compliant column of the TSA checklist with either yes, no, or deficient for each requirement addressed by the TSA checklist. If the column is marked with "yes" then no deficiency or finding will be reported in the assessment report. If the column is marked as "no" then a finding will be documented in the TSA checklist and reported in the assessment report including any required corrective action. If the column is marked with "deficient" then the deficiency will be documented in the TSA checklist and reported in assessment report, including any required corrective action. The QAO provides evidence in the notes section of the TSA checklist that the TSA was performed in an orderly manner and details applicable aspects of a project addressed during the TSA.

6.4.1 Observations of Field Activities

The goal of observing field activities is to generate information that is reliable, unambiguous, and of the type, quality, and quantity needed to determine if projects are complying with requirements of planning documents. The observation of field activities gives opportunity for the QAO to evaluate the requirements noted in the TSA checklist and to complete the notes section of the TSA checklist. The observation of work activities against a TSA checklist is an effective technique for determining whether project activities are adequately adhering to planning documents. The QAO will not enter into the work activity or interfere with the project or procedure. The QAO will not make suggestions or attempt to correct a deficiency or finding. The QAO will adhere to the agenda created during the notification and coordination process as closely as possible to minimize disruption of work activities.

Observation of field activities is not a requirement of a TSA and is completed at the discretion of the QAO.

6.4.2 Interview Process

The goal of a TSA interview is to generate information that is reliable, unambiguous, and of the type, quality, and quantity needed to determine if projects are complying with requirements detailed in planning documents. The QAO will interview the Project Manager to help the QAO understand if, how, and to what extent the quality assurance policies and procedures have been communicated and distributed. The interview gives opportunity for the QAO to evaluate the requirements noted in the TSA checklist and to complete the notes section of the TSA checklist. In addition, interviews allow the Project Manager to answer questions resulting from the TSA checklist evaluation and/or observation of field activities. The interview provides the dialogue needed between the QAO and the Project Manager and allows the QAO to inquire about details stated in planning documents and noted on the TSA checklist. The QAO will adhere to the agenda created during the notification and coordination process as closely as possible to minimize disruption of work activities.

6.5 Assessment Report

The QAO summarizes the details produced by the TSA checklist evaluation in the assessment report. If the compliant column of the TSA checklist is marked with either "no" or "deficient" then the QAO will report either a finding or deficiency in the assessment report.

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The TSA checklist and assessment report are the record to document any deficiencies and/or findings observed during the TSA process. The assessment report, reports all findings and/or deficiencies discovered during the TSA and includes required corrective action. The QAO evaluates the significance of any deficiencies and/or findings that are found relative to the overall data quality goals, integrity of data, or project operations. The QAO will provide the completed assessment report and TSA checklist to the Project Manager, Team Supervisor, and the Program Manager after concluding the TSA.

The responsibility of quality for a project remains with the Project Manager, rather than the QAO. The QAO acts as the manager's agent because the manager has the authority to implement corrective action. Both the manager and the QAO need to understand that a TSA and assessment report are intended to provide feedback to the Project Manager on the integrity of a project's quality assurance systems and produce positive changes in the project. The QAO identifies the deficiencies, findings, and corrective action but the Project Manager is responsible for implementing the specific solutions to correct the deficiencies and findings for the project or procedure.

In cases where the Project Manager is not responsible for a deficiency identified during a TSA for a specific project, the QAO will reach out to appropriate SWQB staff to resolve the issue at the conclusion of the TSA. A deficiency can lead to the notification of a new TSA to resolve the observed deficiency.

6.6 Corrective Action

The QAO will distribute the TSA checklist and assessment report to the Project Manager, Team Supervisor, and Program Manager. The QAO will note any corrective action required to address deficiencies and/or findings in the report. The corrective action will focus on data quality, data integrity, and decision-making based on the data that are generated or collated through the project. In certain cases, the Project Manager may need to perform corrective action as quickly as possible. Such cases may include adverse impacts on data quality and threats to health and safety. The Project Manager is responsible for implementation and completion of the corrective action within the time specified by the QAO, and must inform the QAO once corrective action has been completed. If deficiencies and/or findings are not corrected in the specified time and the findings or deficiencies significantly impact the conclusions drawn from the environmental data, the QAO will notify the SWQB Chief for further action. A Project Manager may be required to submit a corrective action implementation plan at the QAO's request. If needed, the Project Manager must submit the corrective action plan within a reasonable time frame so that the deficiencies and/or findings do not limit the ability of the project to meet its objectives.

If implementation of corrective action for a project does not adequately address the deficiency and/or findings, and depending on the severity, the Project Manager may be forced to temporarily cease all environmental data collection activities that affect data quality, data integrity, or decisions being made based on data until the corrective action is implemented. The temporary termination of environmental data collection activities for a project can only be implemented with the approval of the SWQB Chief.

The QAO may require and initiate a follow-up TSA after an audit. In follow-up TSA, the QAO may evaluate the corrective action, the findings, and/or deficiencies concluded from a TSA.

7.0 Data and Records Management

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At the beginning of the planning phase, a TSA file folder will be established in the NMED SWQB network drive under the Standards Planning and Reporting Team folder at:

\\NMENV\ServerShares\$\WPD\SWQB\MASS\Standards Planning and Reporting Team\QA QC Documents\QA Audit

The file folder will be used to house all documents and records from the initiation of the TSA to completion of assessment report and evaluation of corrective actions, as applicable. The file folder will contain all materials collected during the course of the TSA, including:

- planning documents;
- all relevant correspondence, such as notification email/letters;
- working documents such as TSA checklist;
- documents or notes created during planning document review;
- assessment reports; and,
- any other documents collected or arising from the assessment such as corrective action reports.

8.0 Quality Control and Quality Assurance

An effective TSA will contribute to a reduction in occurrences of questionable data, faulty conclusions, and inappropriate practices. Key purposes of a TSA include the discovery and characterization of sources of measurement error, the reduction of deficiencies and findings, and the safeguarding of the SWQB decision-making process. The TSA will help to ensure that planning documents are being followed and that the resulting data are sufficient and adequate for their intended use. All SWQB personnel will be familiar with these protocols, sign the acknowledgment statement associated with this specific SOP and implement procedures as they are defined.

Proper use of a TSA will provide increased confidence that the collected environmental data are defensible and properly documented. The SWQB Chief or their designee will verify that the QAO implements a TSA according to this SOP. The SWQB Chief has final approval authority to cease environmental activities for any environmental project that has not addressed deficiencies or findings through corrective action(s). The QAO's performance will be regularly evaluated by the SWQB Chief or their designee.

9.0 Related Forms

TSA checklist
SWQB WQMP/CPP
SWQB QMP
SWQB QAPP
SWQB SOP(s)
SWQB CALM
Project Specific QAPP(s)
Project Specific SAP(s)
Project Specific FSP(s)
Project Specific SOP(s)

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10.0 Revision History

- Revision 0. January 2021. Original.
Miguel Montoya, QAO; Miguel Montoya, SME; SWQB Chief, Shelly Lemon
- Revision 1. March 2022. Revision 1. SOP updated so that the field observations portion of the TSA is not mandatory. Finding and deficiency definitions updated. Added a section on TSA checklist evaluation. Clarity added throughout SOP. Writing style updated.
Miguel Montoya, QAO; Miguel Montoya, SME; SWQB Chief, Shelly Lemon

11.0 References

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