

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

IN THE MATTER OF:

**PETITION TO AMEND 20.6.4.126 NMAC AND
20.6.4.141 NMAC TO ESTABLISH A SEGMENT-
SPECIFIC TEMPERATURE CRITERION
FOR A PORTION OF THE UPPER SANDIA
CANYON ASSESSMENT UNIT**

WQCC No. 24-65(R)

**Triad National Security, LLC
and U.S. Department of Energy's National Nuclear
Security Administration,**

Petitioners.

**NOTICE OF INTENT TO PRESENT TECHNICAL TESTIMONY:
TRIAD NATIONAL SECURITY, LLC AND THE UNITED STATES
DEPARTMENT OF ENERGY, NATIONAL NUCLEAR SECURITY
ADMINISTRATION, LOS ALAMOS FIELD OFFICE**

Triad National Security, LLC (Triad), the management and operating contractor of Los Alamos National Laboratory (Laboratory or LANL) and the United States Department of Energy's National Nuclear Security Administration (NNSA), by and through the Los Alamos Field Office, (NA-LA) (Triad and NA-LA are, collectively, "Petitioners"), pursuant to 20.1.6.202 NMAC and the Scheduling and Prehearing Order issued December 20, 2024, submit this Notice of Intent to Present Technical Testimony.

1. Petitioners' Proposed Amendments to New Mexico Water Quality Standards.

Petitioners' proposed amendments to New Mexico's Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC, were provided as Petitioners' **Exhibit N**, (LANL UAA_0208-0266), filed on October 23, 2024. At this time, Petitioners are not recommending modification to their proposal.

2. Technical Witnesses for Petitioners.

Petitioners expect to offer the following technical witnesses, both of whom will testify on behalf of Triad and DOE/NNSA, at the in-person hearing on May 13, 2025:

- a. Timothy Goering
- b. Matthew Segura

3. Direct Testimony Copies and Estimated Duration of the Direct Testimony.

A copy of the direct testimony of each of Petitioners' technical witness identified above is attached and designated Petitioners' **Exhibits V** and **W** (LANL UAA_0333-0357 and LANL UAA_0358-0384, respectively). LANL anticipates that the duration of each witness's direct oral testimony will be approximately 30 minutes.

4. Qualifications of Technical Witness, Including Educational and Work Background Descriptions.

The qualifications, including educational and work background of each of the LANL technical witnesses, are described in detail in the pre-filed direct testimony of each witness. A summary for each LANL technical witness is provided here:

a. Timothy Goering

Mr. Goering received a Bachelor of Arts degree in Environmental Science from the University of Virginia and a Master of Science degree in Hydrology and Water Resources from the University of Arizona. Mr. Goering has worked for nearly 40 years in the environmental field, with most of his work experience is in hydrology and in environmental characterization and remediation. He is currently employed by Triad as an Environmental Professional in the Environmental Protection and Compliance Division at Los Alamos National Laboratory.

In 1983, he began working for the environmental consulting firm Ecology and Environment Inc. conducting field assessments of hazardous waste sites. While in graduate school at the University of Arizona, he worked for another environmental consulting company on a large-scale water resource evaluation of the Little Colorado River Basin in Arizona. From 1987 to 1992, he worked for Jacobs Engineering as a site hydrologist for the DOE's Uranium Mill Tailings Remedial Action Program. From 1992 to 2007, he worked at Sandia National Laboratories as a subcontractor providing hydrogeological technical support for characterization and corrective action at Sandia's Mixed Waste Landfill.

Since 2007, Mr. Goering has worked at LANL on a variety of projects related to environmental analysis and compliance, with much of the work related to groundwater and surface water characterization and monitoring. From 2007 to 2015, he served as the technical lead for the Interim Facility-Wide Groundwater Monitoring Program. From 2013 to 2018, he was the technical lead for the RDX Remediation Project, leading a team of scientists to assess high explosives contamination in surface water and groundwater. From 2018 to 2020, he worked for LANL's Earth Systems Observation Group, as a Site operations manager for one of the DOE's atmospheric observatories, the Atmospheric Radiation Measurement Mobile Facility One. In 2020, Mr. Goering joined LANL's Environmental Protection and Compliance group as an Environmental Professional. His curriculum vitae is attached and designated Petitioners' **Exhibit O** (LANL UAA_0267-0273).

b. Matthew Segura

Mr. Segura received a Bachelor of Science degree in Biology with a double minor in Chemistry and Studio Art from the University of New Mexico in 2013. He holds a dual Master of Science degree in Water Resources and Community and Regional Planning from the University

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of New Mexico. His graduate research examined long-term impacts of wildfire and water security of municipal watersheds in the western United States.

Mr. Segura has worked as an environmental professional for about 10 years. He has worked with federal agencies and national laboratories, performing complex environmental compliance and hydrologic assessments and scientific investigations. At the U.S. Army Corps of Engineers, he specialized in long-term water quality monitoring, hazardous waste management, and civil works initiatives. At the Laboratory, he works as an environmental professional in the Environmental Protection and Compliance Division, supporting compliance with federal and state water quality regulations, including Clean Water Act standards and NPDES permits. His responsibilities include water quality monitoring, regulatory compliance, hydrologic data analysis, and environmental management. He was a lead scientist and one of the primary authors of the final “Use Attainability Analysis for Upper Sandia Canyon” (Final UAA), provided as Petitioners’ **Exhibit B** (LANL UAA_0022-0070). His curriculum vitae is included as Petitioners’ **Exhibit U** (LANL UAA_0330-0332).

5. Exhibits

In addition to the attachments identified above, LANL intends to offer additional exhibits at the hearing. The full index of LANL exhibits includes:

Reference	Exhibit Title	Bates Range
Petitioners’ Exhibit A	Approved UAA Work Plan	LANL UAA_0001-0021
Petitioners’ Exhibit B	Final UAA	LANL UAA_0022-0070
Petitioners’ Exhibit C	12.10.20 EJRC Agenda	LANL UAA_0071-0073
Petitioners’ Exhibit D	02.23.21 ATEM Agenda	LANL UAA_0074-0075
Petitioners’ Exhibit E	10.25.21 Draft UAA Submission	LANL UAA_0076-0121

Petitioners' Exhibit F	2022 NMED and EPA Comments	LANL UAA_0122-0129
Petitioners' Exhibit G	2022 Public Comments	LANL UAA_0130-0133
Petitioners' Exhibit H	2023 Response to Comments	LANL UAA_0134-0175
Petitioners' Exhibit I	02.21.24 ATEM Agenda	LANL UAA_0176-0177
Petitioners' Exhibit J	2024 Response to Public Comments	LANL UAA_0178-0190
Petitioners' Exhibit K	05.07.24 EJRC Agenda	LANL UAA_0191-0192
Petitioners' Exhibit L1	05.09.24 Rio Grande Sun Notice	LANL UAA_0193-0194
Petitioners' Exhibit L2	05.09.24 Los Alamos Daily Post Notice	LANL UAA_0195-0196
Petitioners' Exhibit L3	05.09.24 SFe New Mexican Notice	LANL UAA_0197-0198
Petitioners' Exhibit L4	05.07.24 LANL EPRR Notice	LANL UAA_0199-0200
Petitioners' Exhibit L5	05.09.24 Gov Delivery Notice	LANL UAA_0201-0202
Petitioners' Exhibit M	Final UAA Errata Document	LANL UAA_0203-0207
Petitioners' Exhibit N	Proposed Amendment to 20.6.4 NMAC	LANL UAA_0208-0266
Petitioners' Exhibit O	Timothy Goering CV	LANL UAA_0267-0273
Petitioners' Exhibit P	2015 LANL NMED Correspondence	LANL UAA_0274-0286
Petitioners' Exhibit Q	2016 NMED LANL Correspondence	LANL UAA_0287-0291
Petitioners' Exhibit R	2018 Draft Work Plan	LANL UAA_0292-0314
Petitioners' Exhibit S	2019 Work Plan Submittal	LANL UAA_0315-0326
Petitioners' Exhibit T	04.09.20 NMED Work Plan Approval	LANL UAA_0327-0329
Petitioners' Exhibit U	Matthew Segura CV	LANL UAA_0330-0332
Petitioners' Exhibit V	Tim Goering Testimony	LANL UAA_0333-0357
Petitioners' Exhibit W	Matthew Segura Testimony	LANL UAA_0358-0384

The above-listed exhibits are included with this Notice of Intent.

Respectfully submitted,

TRIAD NATIONAL SECURITY, LLC

By: /s/ Maureen Dolan

Maureen Dolan
Maxine McReynolds
Office of General Counsel
Los Alamos National Laboratory
P.O. Box 1660, MS A187
Los Alamos, New Mexico 87545
(505) 667-3766
dolan@lanl.gov
mcreynolds@lanl.gov

DEPARTMENT OF ENERGY'S NATIONAL
NUCLEAR SECURITY ADMINISTRATION,
LOS ALAMOS FIELD OFFICE

By: /s/ Stephen Jochem

Stephen Jochem
U.S. Department of Energy
NNSA Los Alamos Field Office
3747 West Jemez Road
Los Alamos, New Mexico 87544
(505) 423-3681
stephen.jochem@nnsa.doe.gov

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2025, a true copy of the foregoing *Notice of Intent to Present Technical Testimony: Triad National Security, LLC and the United States Department of Energy, National Nuclear Security Administration, Los Alamos Field Office* was served via electronic mail to the following:

Felicia Orth Felicia.l.orth@gmail.com <i>Hearing Officer</i>	Brecken L. Scott Assistant General Counsel New Mexico Environment Department Brecken.scott@env.nm.gov <i>Counsel for the New Mexico Environment Department</i>
Pamela Jones Commission Administrator Office of Public Facilitation New Mexico Environment Department Pamela.Jones@env.nm.gov	Nicholas R. Maxwell inspector@sunshineaudit.com
Eduardo Ugarte II Assistant Attorney General Government Counsel & Accountability New Mexico Department of Justice EUgarte@nmdoj.gov	

By: /s/ Maureen Dolan
Maureen Dolan