

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

IN THE MATTER OF:

**PETITION TO AMEND 20.6.4.97 NMAC
TO MODIFY DESIGNATED USE OF THE
RIO GRANDE TO FOUR HILLS BRIDGE
REACH OF THE TIJERAS ARROYO,**

No. WQCC 25-28 (R)

**National Technology & Engineering
Solutions of Sandia, LLC,**

Petitioner.

**NEW MEXICO ENVIRONMENT DEPARTMENT'S
NOTICE OF INTENT TO PRESENT DIRECT TECHNICAL TESTIMONY**

Pursuant to 20.1.6.202 NMAC and the *Pre-Hearing Order* issued by the Hearing Officer on October 22, 2025, the New Mexico Environment Department (“Department” or “NMED”) submits this Notice of Intent to Present Direct Technical Testimony for the hearing in this matter currently scheduled to begin on December 9, 2025.

1. Entity for whom the witnesses will testify

The witnesses will testify for the Surface Water Quality Bureau of the Water Protection Division of the Department.

2. Identity of witnesses

The Department will call the following witnesses to present technical testimony at the hearing:

Stephani Clark Barkalow is a Water Quality Standards Scientist for the Surface Water Quality Bureau. Her resume is attached as **NMED Exhibit 2**. Ms. Clark Barkalow's direct written testimony is attached as **NMED Exhibit 1**.

Michael Baca is the Water Quality Standards Coordinator for the Surface Water Quality Bureau. His resume is attached as **NMED Exhibit 3**. Otherwise, NMED does not intend for Mr. Baca to present direct testimony, but may present him as a rebuttal witness, and will make him available to assist in answering questions that may go beyond the expertise of the direct witness, Ms. Clark Barkalow.

Lynette Guevara is the Program Manager for the Monitoring, Assessment, and Standards Section of the Surface Water Quality Bureau. Her resume is attached as **NMED Exhibit 4**. NMED does not intend for Ms. Guevara to present direct testimony, but may present her as a rebuttal witness, and will make her available to assist in answering questions that may go beyond the expertise of the direct witness, Ms. Clark Barkalow.

Shelly Lemon is the Surface Water Quality Bureau Chief. Her resume is attached as **NMED Exhibit 5**. NMED does not intend for Ms. Lemon to present direct testimony, but may present her as a rebuttal witness, and will make her available to assist in answering questions that may go beyond the expertise of the direct witness, Ms. Clark Barkalow.

The Department reserves the right to call any additional witnesses to provide direct or rebuttal testimony in response to any other notice of intent filed, to public comment provided, or otherwise, in this matter.

3. Location(s) at which witnesses will be present

The witnesses will be present in person in Santa Fe.

4. Estimated duration of direct oral testimony of witnesses

Pursuant to the *Pre-Hearing Order*, the estimated duration of Ms. Clark Barkalow's direct oral testimony is 30 minutes.

5. List of exhibits to be offered by the Department at the hearing

A list of exhibits that the Department intends to offer into evidence in this matter is attached to this Notice of Intent. The Department reserves the right to introduce and move for the admission of any other exhibit in support of rebuttal testimony at the hearing in this matter.

Respectfully submitted,

NEW MEXICO ENVIRONMENT DEPARTMENT

By: /s/ Brecken L. Scott
Brecken L. Scott
Assistant General Counsel
PO Box 5469
Santa Fe, New Mexico 87502-5469
(505) 490-1177
brecken.scott@env.nm.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *New Mexico Environment Department's Notice of Intent to Present Direct Technical Testimony* was filed with the Water Quality Control Commission Administrator and served via electronic mail on the following parties in this matter on November 19, 2025.

Pamela Jones, Commission Administrator
Office of Public Facilitation
New Mexico Environment Department
Pamela.jones@env.nm.gov

Eduardo Uguarte II
New Mexico Department of Justice
Eugarte.nmdoj.gov
Counsel for the WQCC

Nicholas Maxwell
inspector@sunshineaudit.com

Felicia Orth
Felicia.orth@gmail.com
Hearing Officer

Dalva Moellenberg
Serafina I. Seluja
Gallagher & Kennedy
DLM@gknet.com
Serafina.seluja@gknet.com
*Counsel for National Technology &
Engineering Solutions of Sandia, LLC*

Konstantin Parkhomenko
knparkh@sandia.gov
*National Technology & Engineering
Solutions of Sandia, LLC*

/s/ Brecken L. Scott

Brecken L. Scott

LIST OF EXHIBITS

Exhibit #	Title	Total # of pages
NMED Exhibit 1	Direct Testimony of Stephani Clark Barkalow	12
NMED Exhibit 2	Resume of Stephani L. Clark Barkalow	5
NMED Exhibit 3	Resume of Michael G. Baca	2
NMED Exhibit 4	Resume of Lynette Stevens Guevara	3
NMED Exhibit 5	Resume of Shelly Lemon	4
NMED Exhibit 6	2024 – 2026 State of New Mexico Clean Water Act § 303(d)/§ 305(b) Integrated Report	402
NMED Exhibit 7	State of New Mexico Water Quality Management Plan & Continuing Planning Process	42
NMED Exhibit 8	New Mexico Environment Department Letter re: Work Plan Approval (February 9, 2018)	2
NMED Exhibit 9	New Mexico Environment Department Comments for Tijeras Arroyo UAA (September 21, 2021)	3
NMED Exhibit 10	New Mexico Environment Department Letter re: Revised Work Plan Approval (March 8, 2023)	2
NMED Exhibit 11	New Mexico Environment Department Comments for Tijeras Arroyo UAA (April 3, 2023)	6
NMED Exhibit 12	Affidavits of Publication (August 12, 2025)	8
NMED Exhibit 13	NMED's Provide to the Public Documentation (August 2025)	8
NMED Exhibit 14	NMED Letter to SBRAC (August 13, 2025)	1
NMED Exhibit 15	Affidavits of Publication (October 7, 2025)	10
NMED Exhibit 16	NMED's Provide to the Public Documentation (October 2025)	10
NMED Exhibit 17	NMED Update Letter to SBRAC (October 7, 2025)	1