

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



---

**IN THE MATTER OF PROPOSED )  
AMENDMENTS TO GROUND )  
AND SURFACE WATER )  
PROTECTION REGULATIONS, )  
20.6.2 NMAC )**

---

**No. WQCC 17-03(R)**

**WILLIAM C. OLSON  
NOTICE OF INTENT TO PRESENT REBUTTAL TESTIMONY**

Pursuant to section 20.1.6.202.A NMAC of the New Mexico Water Quality Control Commission (“Commission”) Rulemaking Procedures and the Commission Hearing Officer’s June 2, 2017 “Revised Procedural Order” and October 2, 2017 “Order on the Extension of the Deadline for Submittal of Rebuttal Testimony”, I hereby file this Notice of Intent to Present Rebuttal Testimony regarding Commission hearing No. WQCC 17-03(R).

1. Identify the person for whom the witnesses will testify: William C. Olson, a hydrologist, representing myself as a member of the public interested in protection of New Mexico water resources.
2. Identify each technical witness the person intends to present, and state the qualifications of that witness, including a description of their education and work background:  
William C. Olson intends to present technical rebuttal testimony. A description of my education and work background is set forth in my September 11, 2017 pre-filed written direct testimony.
3. Include a copy of the testimony of each technical witness in narrative form, and state the estimated duration of the direct oral testimony of that witness: My rebuttal testimony is

contained in **WCO Rebuttal Exhibit 1**. The estimated duration of direct oral testimony is approximately 15 minutes to summarize important points of the written rebuttal testimony

4. Include the text of any recommended modifications to the proposed regulatory change: The text of my recommended rebuttal rule modifications, based upon my rebuttal of the direct testimony of the hearing parties, is summarized in **WCO Rebuttal Exhibit 2**.

5. List and attach all exhibits anticipated to be offered by that person at the hearing:  
The exhibits supporting the rebuttal testimony of William C. Olson are:

<b>WCO Rebuttal Exhibit 1</b>	-	Written Rebuttal Testimony of William C. Olson
<b>WCO Rebuttal Exhibit 2</b>	-	William C. Olson October 27, 2017 Proposed Rebuttal Amendments Related to Hearing Parties September 11, 2017 Direct Testimony in Water Quality Control Commission Hearing No. WQCC 17-03(R).

WHEREFORE, William C. Olson respectfully requests that the Commission accept this Notice of Intent to Present Rebuttal Testimony.

DATED this 27<sup>th</sup> day of October, 2017.

Respectfully submitted,

By:   
\_\_\_\_\_  
William C. Olson  
14 Cosmic Way  
Lamy, New Mexico  
(505) 466-2969  
[billjeanie.olson@gmail.com](mailto:billjeanie.olson@gmail.com)

## CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2017, a true and correct copy of the foregoing *William C. Olson Notice of Intent to Present Rebuttal Testimony* was served via electronic mail to the following:

Pam Castaneda, Administrator\*  
Water Quality Control Commission  
Room N-2168, Runnels Building  
1190 St. Francis Dr.  
Santa Fe, New Mexico 87505  
[pam.castaneda@state.nm.us](mailto:pam.castaneda@state.nm.us)  
\*Original and 12 hard copies also hand delivered

John Verheul  
Lara Katz  
Office of General Counsel  
New Mexico Environment Department  
P.O. Box 5469  
Santa Fe, New Mexico 87502-5469  
[john.verheul@state.nm.us](mailto:john.verheul@state.nm.us)  
[lara.katz@state.nm.us](mailto:lara.katz@state.nm.us)

Dalva L. Moellenberg  
Gallagher and Kennedy, P.A.  
1239 Paseo de Peralta  
Santa Fe, New Mexico 87501  
[DLM@gknet.com](mailto:DLM@gknet.com)

Pete Domenici  
Lorraine Hollingsworth  
Domenici Law Firm, P.C.  
320 Gold Ave. SW, Suite 1000  
Albuquerque, New Mexico 87102  
[pdomenici@domenicilaw.com](mailto:pdomenici@domenicilaw.com)  
[lhollingsworth@domenicilaw.com](mailto:lhollingsworth@domenicilaw.com)

Michael Bowen  
New Mexico Mining Association  
1470 St. Francis Dr.  
Santa Fe, New Mexico 87505  
[nmma@comcast.net](mailto:nmma@comcast.net)

Jamie Park  
Douglas Meiklejohn  
Eric Jantz  
Jonathan Block  
New Mexico Environmental Law Center  
1405 Luisa Street, Suite 5  
Santa Fe, New Mexico 87505  
[jpark@nmelc.org](mailto:jpark@nmelc.org)  
[dmeiklejohn@nmelc.org](mailto:dmeiklejohn@nmelc.org)  
[ejantz@nmelc.org](mailto:ejantz@nmelc.org)  
[jblock@nmelc.org](mailto:jblock@nmelc.org)

Louis W. Rose  
Kari Olson  
Montgomery & Andrews, P.A.  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
[lrose@montand.com](mailto:lrose@montand.com)  
[kolson@montand.com](mailto:kolson@montand.com)

Timothy A. Dolan  
Office of Laboratory Counsel  
Los Alamos National Laboratory  
P.O. Box 1663, MS A187  
Los Alamos, New Mexico 87545  
[tdolan@lanl.gov](mailto:tdolan@lanl.gov)

William Brancard  
Cheryl Bada  
Energy, Minerals and Natural Resources  
Department  
1220 South St. Francis Dr.  
Santa Fe, NM 87505  
[bill.brancard@state.nm.us](mailto:bill.brancard@state.nm.us)  
[cheryl.bada@state.nm.us](mailto:cheryl.bada@state.nm.us)

Michael L. Casillo  
AFLOA/JACE  
1500 West Perimeter Road, Suite 1500  
Joint Base Andrews, MD 20762  
[michael.l.casillo2.civ@mail.mil](mailto:michael.l.casillo2.civ@mail.mil)

Russell Church  
NMML EQA Subsection  
New Mexico Municipal League  
P.O. Box 846  
Santa Fe, NM 87504  
[rchurch@redriver.org](mailto:rchurch@redriver.org)

John Grubescic  
Office of the Attorney General  
Post Office Drawer 1508  
Santa Fe, NM 87504-1508  
[jgrubescic@nmag.gov](mailto:jgrubescic@nmag.gov)

Stuart R. Butzier  
Christina C. Sheehan  
Modrall, Sperling, Roehl, Harris & Sisk,  
P.A.  
P.O. Box 2168  
Albuquerque, NM 87103-2168  
[stuart.butzier@modrall.com](mailto:stuart.butzier@modrall.com)  
[christina.sheehan@modrall.com](mailto:christina.sheehan@modrall.com)



---

William C. Olson