

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



_____)
In the Matter of:)
PROPOSED AMENDMENT)
TO 20.6.6 NMAC (Dairy Rule))
_____)

No. WQCC 12-09 (R)

November 19, 2012

**AMIGOS BRAVOS, CABALLO CONCERNED CITIZENS AND RIO GRANDE
CHAPTER OF THE SIERRA CLUB ("THE COALITION")
NOTICE OF INTENT TO PRESENT TECHNICAL TESTIMONY**

Amigos Bravos, the Caballo Concerned Citizens, and the Sierra Club Rio Grande Chapter (collectively, "the Coalition"), pursuant to Section 303 of the Guidelines for Water Quality Control Commission Regulation Hearings and the Procedural Order issued on August 26, 2011, files this Notice of Intent to Present Technical Testimony at the public hearing scheduled for October 11, 2011.

1. Person filing the statement. This statement is filed by the Coalition.
2. Witnesses and Qualifications. Kathy Martin, P.E., B.S., Petroleum Engineering, 1987, University of Oklahoma, M.S., Civil Engineering, 1989, University of Oklahoma. Ms. Martin is a Professional Engineer licensed in Oklahoma, who an environmental consultant and the principal in Martin Environmental Services, Norman, Oklahoma. Following an extensive career in the public sector, in her private consulting activities Ms. Martin provides expertise in areas of industrial permitting for air quality, non-hazardous industrial wastewater, and closure of surface impoundments. performs engineering review and critique of permit applications submitted to regulatory agencies with respect to wastewater treatment technology and

compliance with environmental regulations. Ms. Martin provided extensive expert testimony in the original dairy regulations proceedings in 2010. Her resume is attached as Petitioners' NOI Exhibit A.

2. Testimony and Exhibits. The Petitioners' direct testimony, Coalition Exhibit 1, and supporting Coalition Exhibits 'A' through 'N' are attached hereto with a table of contents. The witness will provide an oral summary and then testify.

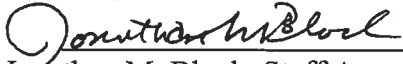
4. Responses To Modifications. The Coalition takes the position that the current regulations should not be modified or, if modified, only to clarify, not change existing requirements, and that there is no basis in law or fact that justify the Petitioners request.

Additional Note

Ms. Martin and the Coalition hereby inform the Commission that her testimony is dedicated to the memory of Jerry Nivens, founder of Caballo Concerned Citizens, who passed away at his home in Caballo, New Mexico, on November 14, 2012.

Respectfully submitted:

THE COALITION


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CERTIFICATE OF SERVICE

I hereby certify that pm this 19th day of November, 2012, the requisite number of copies of the foregoing Notice of Intent to File Technical Testimony and attachments were hand served on the office of the Commission Administrator and a copy mailed, First Class U.S. Postage prepaid to counsel for the Petitioners. I was informed that NMED will not participate in this case and they do not require service.


Jonathan M. Block