

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



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

)
)
)
)
)

**No. WQCC 12-09 (R) and
No. WQCC 13-08 (R)**

**NEW MEXICO ENVIRONMENT DEPARTMENT'S
UNOPPOSED MOTION TO SUPPLEMENT THE RECORD**

Comes now the Ground Water Quality Bureau (“GWQB” or “Bureau”) of the Water Protection Division of the New Mexico Environment Department (“Department” or “NMED”) and respectfully moves the Hearing Officer to admit into the Record Proper the exhibits attached herein. As grounds for this motion, the GWQB states the following:

1. On March 18, 2015, the Department submitted a Motion for Leave to File Amended Notices of Intent to Present Technical and Rebuttal Testimony; attached to the Amended Notices of Intent were written direct and written rebuttal testimony of Trais Kliphuis.

2. It was brought to the Department’s attention that Ms. Kliphuis made references to documents and files in her written testimony attached to the Amended Notices of Intent, and that those documents and files were not attached to the testimony that the Department submitted.

3. Pursuant to a request by the parties for these documents, the Bureau attaches the following exhibits:

- | | |
|----------------|--|
| NMED Exhibit 4 | Disc Containing Audio Recordings of the Technical Working Group Meetings held on May 16, 2014, and June 24, 2014 |
| NMED Exhibit 5 | Meeting Notes from July 29, 2014, Roswell Public Meeting |
| NMED Exhibit 6 | Email Relating to Variance Petition Meeting, November 2, 2012 |
| NMED Exhibit 7 | Memorandum of Meeting of Phone Conversation, July 10, 2013 |

NMED Exhibit 8 Agenda and Sign-In Sheet, Meeting between NMED and GGI
Clients, July 12, 2013

4. The Bureau has contacted the parties and notes no opposition to this motion.

Respectfully submitted,

GROUND WATER QUALITY BUREAU
NEW MEXICO ENVIRONMENT DEPARTMENT



Jeffrey M. Kendall, General Counsel
Christopher Atencio, Assistant General Counsel
Kay R. Bonza, Assistant General Counsel
Office of General Counsel
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469
Telephone: (505) 827-2855
jeff.kendall@state.nm.us
christopher.atencio@state.nm.us
kay.bonza@state.nm.us

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

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

)
)
)
)
)

**No. WQCC 12-09 (R) and
No. WQCC 13-08 (R)**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the New Mexico Environment Department's Unopposed Motion to Supplement the Record along with the attached exhibits were served on the parties of record in this matter via electronic mail and first class mail on April 1, 2015.

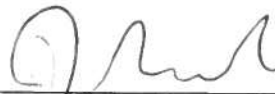
SERVICE LIST

Robert A. Stranahan, IV
Dalva L. Mollenberg, Esq.
Anthony (T.J.) Trujillo, Esq.
Gallagher & Kennedy, P.A.
1239 Paseo de Peralta
Santa Fe, New Mexico 87501
DLM@gknet.com
AJT@gknet.com
Bob.stranahan@gknet.com
*For the Petitioner, Dairy Industry Group for
a Clean Environment (DIGCE)*

Jon Block
Eric Jantz
Douglas Meiklejohn
New Mexico Environmental Law Center
1405 Luisa Street, Ste. 5
Santa Fe, NM 87505
jblock@nmelc.org
For the Coalition

Tannis L. Fox, Assistant Attorney General
Water, Environmental and Utilities Division
Office of the New Mexico Attorney General
P.O. Box 1508
Santa Fe, New Mexico 87504
tfox@nmag.gov
For the New Mexico Attorney General

Wade Jackson, General Counsel
Economic Development Department
Joseph Montoya Building
1100 S. St. Francis Drive
Santa Fe, New Mexico 87505
Wade.jackson@state.nm.us
Counsel for the Commission



Christopher N. Atencio