

_____	)	
In re ALBUQUERQUE	)	
BERNALILLO COUNTY WATER	)	
UTILITY AUTHORITY	)	Appeal No. _____
	)	
Permit No. NM0022250	)	
_____	)	

The Albuquerque Bernalillo County Water Utility Authority (“ABCWUA”) seeks review of National Pollutant Discharge Elimination System (“NPDES”) Permit No. NM0022250 issued by the United States Environmental Protection Agency Region 6 Water Division (“EPA”) to the ABCWUA on December 9, 2025.

DATE: January 5, 2026

Respectfully submitted,

STELZNER, WINTER, WARBURTON,  
FLORES & DAWES, P.A.


Post Office Box 528

Albuquerque, New Mexico 87103

(505) 938-7770

Email: [nwinter@stelznerlaw.com](mailto:nwinter@stelznerlaw.com)

Email: [kherrmann@stelznerlaw.com](mailto:kherrmann@stelznerlaw.com)

By:   
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NANN M. WINTER  
KEITH W. HERRMANN

*Attorneys for Albuquerque Bernalillo County  
Water Utility Authority*

## **CERTIFICATE OF SERVICE**

I certify that copies of the foregoing Notice of Appeal was sent on January 5, 2026 to the following persons in the manner indicated.

By Email:

**United States Environmental Protection Agency**

Tung Nguyen

*Permitting & Water Quality Branch*

[nguyen.tung@epa.gov](mailto:nguyen.tung@epa.gov)

U.S. Environmental Protection Agency

NPDES Permitting and Wetland Section (6WD-PE)

1201 Elm Street, Suite 500

Dallas, Texas 75270-2102

(214) 665-3152

[R6NPDES@epa.gov](mailto:R6NPDES@epa.gov)

Curry Jones

[Jones.Curry@epa.gov](mailto:Jones.Curry@epa.gov)

Renee Wyland

[Wyland.Renee@epa.gov](mailto:Wyland.Renee@epa.gov)

**New Mexico Environment Department:**

Jason Martinez

Permit Team Lead

Surface Water Quality Bureau

[Jason.Martinez2@env.nm.gov](mailto:Jason.Martinez2@env.nm.gov)

Scott Brecken

[brecken.scott@env.nm.gov](mailto:brecken.scott@env.nm.gov)

**New Mexico Acequia Association:**

Vidal Gonzales

*Director of Policy and Planning*

505-614-4495

[vidal@lasacequias.org](mailto:vidal@lasacequias.org)

505 Don Gaspar Ave

Santa Fe, NM 87505

**Pueblo of Isleta:**

Ramona Montoya

[Ramona.Montoya@Isletapueblo.com](mailto:Ramona.Montoya@Isletapueblo.com)

**Amigos Bravos:**

*Sarah Knopp*

*Policy Specialist*

[sknopp@amigosbravos.org](mailto:sknopp@amigosbravos.org)

505-795-2106

2201 Matthew Ave NW,

Albuquerque NM 87104

*Shannon Romeling*

*Projects and Foundations Coordinator*

[Sromeling@amigosbravos.org](mailto:Sromeling@amigosbravos.org)

575-758-3874

114 Des Georges Place

Taos, NM 87571

**ABCWUA:**

Keith Herrmann

[kherrmann@stelznerlaw.com](mailto:kherrmann@stelznerlaw.com)

Nann Winter

[nwinter@stelznerlaw.com](mailto:nwinter@stelznerlaw.com)

John Stomp

[jstomp@stelznerlaw.com](mailto:jstomp@stelznerlaw.com)

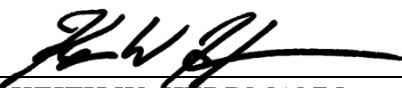
Christopher Melendrez

[cmelendrez@abcwua.org](mailto:cmelendrez@abcwua.org)

Danielle Shuryn

[dshuryn@abcwua.org](mailto:dshuryn@abcwua.org)

By: \_\_\_\_\_

  
KEITH W. HERRMANN

**BEFORE THE ENVIRONMENTAL APPEALS BOARD  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C.**

Appeal No. \_\_\_\_\_

ABCWUA respectfully requests an extension of time to complete its appeal of the permit conditions. This request is necessitated by the 2025 year-end holiday season, during which mandated administrative closures and reduced staffing levels significantly constrained the ABCWUA's ability to conduct the necessary technical and legal evaluations. Given the complexity of the permit conditions and the importance of ensuring a thorough and accurate filing, the intervening holiday schedule has deprived ABCWUA of the consecutive business days required to finalize its review. This request is made in good faith and not for the purpose of undue delay,

but rather to ensure that the final submission reflects a complete and diligent assessment of the permit's requirements.

Granting this extension will not result in prejudice to any party, as the permit is a reissuance of an existing authorization and is not scheduled to become effective until February 1, 2026. Because the status quo remains protected by the current permit, a brief delay in the review process will not impact operations or regulatory oversight.

ABCWUA has attempted to confer with the interested parties in the underlying proceeding and received the following responses: New Mexico Environment Department, EPA Region 6, and the Pueblo of Isleta do not oppose the relief requested in this motion for extension of time. No response was received from Amigos Bravos or the New Mexico Acequia Association despite multiple attempts to obtain their position. ABCWUA requests an order granting the extension prior to the current January 8th deadline and expedited responses as necessary if any party opposes the relief requested.

DATE: January 5, 2026

Respectfully submitted,

STELZNER, WINTER, WARBURTON,  
FLORES & DAWES, P.A.


Post Office Box 528

Albuquerque, New Mexico 87103

(505) 938-7770

Email: [nwinter@stelznerlaw.com](mailto:nwinter@stelznerlaw.com)

Email: [kherrmann@stelznerlaw.com](mailto:kherrmann@stelznerlaw.com)

By:   
NANN M. WINTER  
KEITH W. HERRMANN

*Attorneys for Albuquerque Bernalillo County  
Water Utility Authority*

## **CERTIFICATE OF SERVICE**

I certify that copies of the foregoing Motion for Extension of Time was sent on January 5, 2026 to the following persons in the manner indicated.

By Email:

**United States Environmental Protection Agency**

Tung Nguyen

*Permitting & Water Quality Branch*

[nguyen.tung@epa.gov](mailto:nguyen.tung@epa.gov)

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1201 Elm Street, Suite 500

Dallas, Texas 75270-2102

(214) 665-3152

[R6NPDES@epa.gov](mailto:R6NPDES@epa.gov)

Curry Jones

[Jones.Curry@epa.gov](mailto:Jones.Curry@epa.gov)

Renee Wyland

[Wyland.Renee@epa.gov](mailto:Wyland.Renee@epa.gov)

**New Mexico Environment Department:**

Jason Martinez

Permit Team Lead

Surface Water Quality Bureau

[Jason.Martinez2@env.nm.gov](mailto:Jason.Martinez2@env.nm.gov)

Scott Brecken

[brecken.scott@env.nm.gov](mailto:brecken.scott@env.nm.gov)

**New Mexico Acequia Association:**

Vidal Gonzales

*Director of Policy and Planning*

505-614-4495

[vidal@lasacequias.org](mailto:vidal@lasacequias.org)

505 Don Gaspar Ave

Santa Fe, NM 87505

**Pueblo of Isleta:**

Ramona Montoya

[Ramona.Montoya@Isletapueblo.com](mailto:Ramona.Montoya@Isletapueblo.com)

**Amigos Bravos:**

*Sarah Knopp*

*Policy Specialist*

[sknopp@amigosbravos.org](mailto:sknopp@amigosbravos.org)

505-795-2106

2201 Matthew Ave NW,

Albuquerque NM 87104

*Shannon Romeling*

*Projects and Foundations Coordinator*

[Sromeling@amigosbravos.org](mailto:Sromeling@amigosbravos.org)

575-758-3874

114 Des Georges Place

Taos, NM 87571

**ABCWUA:**

Keith Herrmann

[kherrmann@stelznerlaw.com](mailto:kherrmann@stelznerlaw.com)

Nann Winter

[nwinter@stelznerlaw.com](mailto:nwinter@stelznerlaw.com)

John Stomp

[jstomp@stelznerlaw.com](mailto:jstomp@stelznerlaw.com)

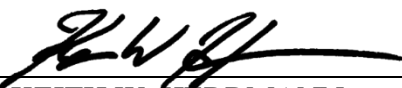
Christopher Melendrez

[cmelendrez@abcwua.org](mailto:cmelendrez@abcwua.org)

Danielle Shuryn

[dshuryn@abcwua.org](mailto:dshuryn@abcwua.org)

By: \_\_\_\_\_

  
KEITH W. HERRMANN