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Notification Provided Via Electronic Mail

May 19, 2025

Keith Rigney; KRigney34@gmail.com
Sierra Los Pinos, HOA, NM3565423
950 Forest Road 10
Jemez Springs, NM 87025

RE: 2025 Sanitary Survey Report

Mr. Rigney:

On March 3, 2025, a representative from Eastern Research Group (ERG) under contract with New Mexico Environment Department Drinking Water Bureau (NMED DWB), conducted a sanitary survey site visit at the Sierra Los Pinos HOA water system.

The Sierra Los Pinos Home Owners Association (HOA) water system must submit a written Corrective Action Plan (CAP) to NMED DWB within 30 days of the sanitary survey cover letter date and take corrective action for any significant deficiencies found during the sanitary survey no later than 120 days after the sanitary survey cover letter date, or be in compliance with a NMED DWB-approved schedule and plan for correcting these deficiencies [NMAC 20.7.10.100 incorporating 40 CFR §141.403(a)(4) and §141.403(a)(5)(I)-(ii)]. For your convenience, a CAP form is included at the end of the sanitary survey report. Enter the date of completion or expected completion next to each deficiency listed. Sign and date the form prior to submittal.

Failure to correct and provide documentation of significant deficiency corrections within the established timeframes will result in treatment technique violation(s) being issued to the Sierra Los Pinos HOA water system.

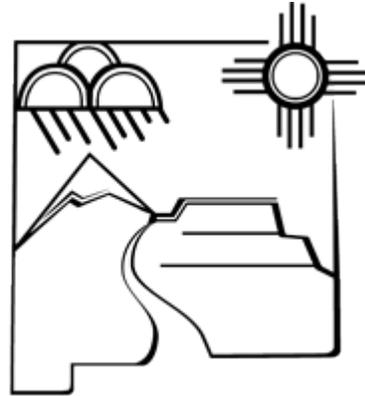
NMED DWB appreciates your assistance in this matter and your compliance efforts to ensure the protection of the State's drinking water. If you or members of your staff have any questions or need additional clarification concerning this report, please feel free to contact me at 505-469-7457 or by e-mail at wayne.jeffs@env.nm.gov.

Respectfully,

Wayne Jeffs, Compliance Supervisor
Drinking Water Bureau
Water Protection Division

cc: Martin Torrez, PWSS Manager (electronic)
Electronic Central File

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE



SANITARY SURVEY REPORT

For

Sierra Los Pinos HOA NM3565423

*Este informe contiene información importante acerca de su agua potable.
Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.*

Prepared by: Michael McFadden (ERG) under contract with NMED DWB
ERG
125 Lincoln Avenue Suite 305
Santa Fe, NM 87501

**State of New Mexico
Environment Department
Water Protection Division
Drinking Water Bureau**
121 Tijeras Ave. NE, Suite 1000
Albuquerque, NM 87102



RECORD OF INSPECTION

This Sanitary Survey Report fulfills the requirements of New Mexico Administrative Code 20.7.10.100 incorporating 40 Code of Federal Regulations 141.21(d) (ii) (2) and 142.16(o)(2) for completing a State-approved survey.

Prepared by: Michael McFadden (ERG) on March 24, 2025, under contract with NMED DWB

INTRODUCTION

A sanitary survey enables the New Mexico Environmental Department Drinking Water Bureau (NMED DWB) to provide a comprehensive review of the components of a water system, to assess the operating condition and adequacy of the water system, and to determine if past recommendations have been implemented effectively. The sanitary survey encompasses eight (8) specific elements that are evaluated during the survey. Those eight (8) elements are:

- Source (Protection, Physical Components, and Condition)
- Treatment
- Distribution System
- Finished Water Storage
- Pumps/Pump Facilities and Controls
- Monitoring/Reporting/Data Verification
- Water System Management/Operations
- Operator Compliance with State Requirements

Each element may not be specifically mentioned within this report; however, a significant deficiency or area of concern will be noted if any issues are discovered with any of these eight (8) elements.

The administrative contact, for Sierra Los Pinos HOA was given prior notification of the sanitary survey. The preliminary sanitary survey letter provided a list of required records that would be reviewed as part of the sanitary survey, as well as a checklist for preparing for the sanitary survey. The letter requested that specific records be provided to the Compliance Officer prior to the sanitary survey.

The sanitary survey was conducted by Michael McFadden (ERG) under contract with the NMED DWB on March 3, 2025. Also in attendance was Donna Smith, Secretary and Tersa Hansen, Metering. The administrative contact and system operator were not in attendance.

BACKGROUND

The previous sanitary survey at Sierra Los Pinos HOA was conducted on October 20, 2017 by Compliance Officer Joseph Savage. During the previous sanitary survey, ten significant deficiencies were cited. NMED DWB was not provided with documentation that the following two (2) deficiencies were corrected:

- 001K, Well lacks a proper vent. Refer to Photographs 1 and 2.
 - Forest Well – 007 - As of the day of the 2025 sanitary survey, the well did not have a proper vent.
 - Aspen Well – 003 - As of the day of the 2025 sanitary survey, the well did not have a proper vent.



Photograph 1 Sierra Los Pinos HOA

Description: Forest Well – 007 – Several of the eight (8) well cap bolts that could be observed were loose and not secured. The well cap does not have a vent.



Photograph 2. Sierra Los Pinos HOA

Description: Aspen Well – 003 – Several of the (8) well cap bolts were loose and not secured. The well cap does not have a vent. System representatives described the feature on top of the well as potentially a water level sensor from a prior project that is not functioning.

SYSTEM DESCRIPTION

The Sierra Los Pinos HOA water system is a ground water system with an approximate population of 416 with 154 total service connections. The population for the Sierra Los Pinos HOA was calculated in accordance with 20.7.10.9.A NMAC. The Sierra Los Pinos HOA board representative stated that the population is approximately 300 persons. The Sierra Los Pinos HOA water system is classified as a community water system according to the New Mexico Drinking Water Regulations 20.7.10 NMAC. The water system consists of three (3) wells, one (1) booster station with one (1) buffer tank, five (5) underground storage tanks, and distribution lines.

Sierra Los Pinos HOA produces approximately 18,000 gallons of water per day from the three (3) ground water wells combined. The operator disinfects the raw water with sodium hypochlorite and then distributes it into two distinct distribution systems. System 1 is served by the Hovenweep Well 002 and Aspen Well 003. The operator

disinfects the raw water in the respective wellhouses from which it is then conveyed to Storage Tank #3 012, Storage Tank #4 013, and Storage Tank #5 014. System 2 is served by the Forest Well 007 (note: participants in the sanitary survey referred to this well as the 'Meadow Well'; and the operator, in a post-survey phone call, was unsure of the common name of the well. This Sanitary Survey Report refers to it as the Forest Well with an active NMED DWB identification number of 007). The operator pumps the raw water from the well pump to Booster Station 009 where it is disinfected prior to an underground 500-gallon 'buffer' tank. The booster pump then conveys the water from the buffer tank to Storage Tank #1 010 and Storage Tank #2 011. Sierra Los Pinos HOA has interconnect capability with a written procedure to connect the two distribution systems.

Sierra Los Pinos HOA is equipped with storage tank level devices with remote telemetry capability in use. The operator has the well pumps programmed to operate on or off based on storage tank levels or timer, and the disinfection pumps are installed to operate automatically upon sensing well operation. Multiple Sierra Los Pinos HOA representatives have view access to check storage tank levels to maintain adequate water pressure.

SANITARY SURVEY FINDINGS & CORRECTIVE ACTIONS

Sanitary surveys serve as a proactive public health measure and can provide important information on a water system's design and operations, can identify minor and significant deficiencies for correction before they become major problems, and can improve overall system compliance.

Significant Deficiencies:

A significant deficiency is defined as any deficiency that is causing or has the potential to cause a threat to public health [New Mexico Administrative Code (NMAC) 20.7.10.100 incorporating 40 Code of Federal Regulations (CFR) §141.403(a)(4) or § 141.723(b)]. Public Water Systems are required to take corrective action for all significant deficiencies found during the sanitary survey. Corrective actions taken by the public water system must be acceptable to the NMED DWB.

Fifteen (15) significant deficiencies were identified in the Sierra Los Pinos HOA water system during the sanitary survey. Those significant deficiencies are noted in the attached Significant Deficiency Summary page.

Corrective Action Plans and Corrective Action:

The Sierra Los Pinos HOA water system must submit a written Corrective Action Plan to NMED DWB within 30 days of the sanitary survey cover letter date and take corrective action for any significant deficiencies found during the sanitary survey no later than 120 days after the sanitary survey cover letter date, or be in compliance with a NMED DWB-approved schedule and plan for correcting these deficiencies [NMAC 20.7.10.100 incorporating 40 CFR §141.403(a)(4) and §141.403(a)(5)(i)-(ii)].

The Sierra Los Pinos HOA water system will be held to the above due dates unless an alternate schedule is requested as part of the Corrective Action Plan.

CONCLUSION

The sanitary survey site visit for the Sierra Los Pinos HOA water system was completed on March 3, 2025.

Failure to submit a Corrective Action Plan or take corrective action for any significant deficiencies identified during the sanitary survey and noted in the attached Significant Deficiency Summary page will result in treatment technique violations as per NMAC 20.7.10.100 incorporating 40 CFR Part 141 Subpart S for ground water systems.

If you have any questions or need additional clarification concerning significant deficiencies noted in this report, please contact Michael McFadden (ERG) at 717-418-3573 or by e-mail at mike.mcfadden@erg.com.

Questions or need for additional clarification regarding resolution and follow-up action should be directed to Wayne Jeffs (NMED DWB) at (505) 469-7457 or by e-mail at wayne.jeffs@env.nm.gov.

Significant Deficiency Summary

Significant Deficiencies:

A significant deficiency is defined as any deficiency that is causing or has the potential to cause a threat to public health [New Mexico Administrative Code (NMAC) 20.7.10.100 incorporating 40 Code of Federal Regulations (CFR) §141.403(a)(4) or § 141.723(b)].

1. **Significant Deficiency Code:** 004B – Failure to provide a complete system-specific and up-to-date emergency response plan (ERP) for review.

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: Does not have a functional ERP. Lack of an adequate ERP could lead to extended delays in supplying safe potable drinking water during minor or major emergencies. Public Water Systems that assess their vulnerabilities and adopt a thorough ERP minimize the likelihood of major delays in supplying safe potable drinking water to their customers.

Required Corrective Action Plan: Sierra Los Pinos HOA must submit a Corrective Action Plan within 30 days of this report.

Required Corrective Action: Sierra Los Pinos HOA must submit to NMED DWB an updated copy of an ERP that includes all required elements.

2. **Significant Deficiency Code:** 004C – Failure to provide a complete system-specific and up-to-date Operation and Maintenance Plan (O&M plan).

Regulatory Citation: 40 CFR 141.403(a)(4)

Significant Deficiency Description: An O&M plan is an essential part of any water supply system. The plan should summarize the actions necessary to identify those steps required for cost-effective, efficient, safe, and reliable system start-up and continued successful operation. A proper plan should result in a flawless transition from one operator to the next. Lack of a proper O&M plan could result in insufficient operation of the water system as well as prolonged water outages during emergency situations. Lack of an adequate O&M plan can result in poor treatment decisions, water outages, failure to monitor, equipment failures, inability to obtain needed services or parts, and improper operation of facilities.

Required Corrective Action Plan: Sierra Los Pinos HOA must submit a Corrective Action Plan within 30 days of this report.

Required Corrective Action: Sierra Los Pinos HOA must submit to NMED DWB an updated copy of an O&M plan that includes all required elements.

3. **Significant Deficiency Code:** 001Q – Failure to properly construct the access hatch and to properly seal and maintain it to prevent the entry of contaminants.

Regulatory Citation: 20.7.10.400.D NMAC

Significant Deficiency Description: Missing or inadequately sized appurtenances can result in damage and contamination of the storage facility.

- a. Storage Tank #1 - 010 – Missing hatch seal.
- b. Storage Tank #2 – 011 - Incomplete and deteriorated hatch seal
- c. Storage Tank #3 – 012 - No observation of an effective seal.
- d. Storage Tank #4 – 013 – No observation of an effective seal.
- e. Storage Tank #5 – 014 – No observation of an effective seal.

Required Corrective Action Plan: Sierra Los Pinos HOA must submit a Corrective Action Plan within 30 days of this report.

Required Corrective Action: Sierra Los Pinos HOA must submit to NMED DWB photographs that show evidence that the storage tank access hatches are adequately sealed and protected from contamination.



Photograph 4. Sierra Los Pinos HOA

Description: Storage Tank #3 - 012, #4 - 013, or #5 – 014

Hatch lid is bolted to the access at ground level or below grade and a seal could not be observed. The type and style of the access is similar for the three (3) tanks listed in the description.



Photograph 5. Sierra Los Pinos HOA

Description: Storage Tank #3 - 012, #4 - 013, or #5 – 014 access hatch photograph provided by Sierra Los Pinos HOA from a 2023 inspection. Hatch is at ground level or below grade and has an incomplete and deteriorated seal that was not observed as replaced after the inspection.



Photograph 6. Sierra Los Pinos HOA

Description: Storage Tank #2 – 011 access hatch photograph provided by Sierra Los Pinos HOA from a 2023 inspection. Hatch is at ground level and has an incomplete and deteriorated seal.



Photograph 7. Sierra Los Pinos HOA

Description: Storage Tank #1 – 010 access hatch photograph provided by Sierra Los Pinos HOA from a 2023 inspection. Hatch does not have an observable seal.

- 4. Significant Deficiency Code:** 001B – Failure to provide an overflow line which is constructed to prevent contaminants from entering the tank.

Regulatory Citation: 20.7.10.400.B NMAC

Significant Deficiency Description: Properly protected storage facilities prevent contaminated water, insects, vermin, or other potential contaminants from entering the facility. Overflows should discharge near ground level that protects the storage tank from erosion and is screened or fitted with an acceptable flap valve.

- a. Storage Tank #1 – 010 – No overflow observed.
- b. Storage Tank #2 – 011 – No overflow observed.
- c. Storage Tank #3 – 012 – No overflow observed.
- d. Storage Tank #4 – 013 – No overflow observed.
- e. Storage Tank #5 – 014 – No overflow observed.

Required Corrective Action Plan: Sierra Los Pinos HOA must submit a Corrective Action Plan within 30 days of this report.

Required Corrective Action: Sierra Los Pinos HOA must submit to NMED DWB descriptions of how the storage tanks are designed to overflow and photographs that any overflow outlets are properly constructed and screened.



Photograph 8. Sierra Los Pinos HOA

Description: Storage Tank #1 – 010 and #2 – 011 shown, each with multiple vents and other pipe attachments at or above the tops of the tanks. Overflow locations were not known.



Photograph 9. Sierra Los Pinos HOA

Description: Storage Tank #3 – 012, #4 – 013, and #5 – 014 are buried tanks within the fence line. Each tank is equipped with multiple vents and other pipe attachments above the tops of the tanks. Overflow locations were not known.

- 5. **Significant Deficiency Code:** 001N – Failure to maintain the storage tank in a manner that is free of leaks, significant structural cracking, corrosion, or advanced concrete spalling.

Regulatory Citation: 20.7.10.400.D NMAC

Significant Deficiency Description: The Storage Tank #2 – 011 has interior and exterior corrosion. Failure of storage facility will result and water outage; leaks in an area with no water pressure can result in the introduction of foreign materials into the facility.

Required Corrective Action Plan: Sierra Los Pinos HOA must submit a Corrective Action Plan within 30 days of this report.

Required Corrective Action: Sierra Los Pinos HOA must submit to NMED DWB a plan to address the reliability of the corroded storage tank.



Photograph 10. Sierra Los Pinos HOA

Description: Storage Tank #2 – 011 corroded exterior sidewall of the partially buried steel tank.



Photograph 11. Sierra Los Pinos HOA

Description: Storage Tank #2 – 011 photograph provided by Sierra Los Pinos HOA from a 2023 inspection. Corroded interior sidewall above water level.

Notes and Recommendations Summary

Notes and Recommendations are defined as any issue which in the estimation of the NMED DWB, is not currently significant enough to be considered as a Significant Deficiency, however, the issue should be further investigated or addressed by the water system to not negatively contribute to the poor operations, management, or adequacy of the water system. Recommendations may be escalated to significant deficiencies if they are not addressed before the next sanitary survey.

The following Notes & Recommendations were identified at the Sierra Los Pinos HOA water system during the survey.

1. **Notes & Recommendations:** It is highly recommended that the water system's certified operator attend the sanitary survey to ensure that all operational questions are appropriately answered.

Recommended Action: Sierra Los Pinos HOA should ensure that the water system's certified operator attends future sanitary surveys.

2. **Notes & Recommendations:** Forest Well – 007 and Aspen Well – 003 have loose bolts on the sanitary seal on the wellhead. No visible gap in the seal was observed. Refer to photographs 1 and 2.

Recommended Action: It is recommended that the system tighten the bolts on the wellhead to ensure a complete seal around the wellhead is maintained.

3. **Notes & Recommendations:** It is highly recommended that each public water system develop and maintain a system-specific source water protection plan.

Recommended Action: Sierra Los Pinos HOA should develop and implement a system-specific source water protection plan and have it available for future sanitary surveys. NMED DWB's no-cost source water protection program can assist with developing a source water assessment and protection plan for the system.

4. **Notes & Recommendations:** It is highly recommended that the Distribution System 2 inactive well be properly abandoned and physically disconnected from the water system. It was observed to be actively venting during the sanitary survey and had a cracked well cap.

Recommended Action: Sierra Los Pinos HOA should submit to NMED DWB a plan to properly abandon and physically disconnect the well from the water system.



Photograph 12. Sierra Los Pinos HOA

Description: Inactive well in Distribution System 2 that is not properly abandoned and is physically connected to the water system.

5. **Notes & Recommendations:** It is highly recommended that the leak on the Hovenweep Well – 002 discharge line be repaired.

Recommended Action: Sierra Los Pinos HOA should repair the small leak before it gets worse.

6. **Notes & Recommendations:** It is highly recommended that the woody vegetation be maintained on and around the partially buried Storage Tank #1 – 010 and Storage Tank #2 – 011. Refer to Photograph 8.

Recommended Action: Sierra Los Pinos HOA should routinely maintain all vegetation that could impact the operation and maintenance of the storage tanks.

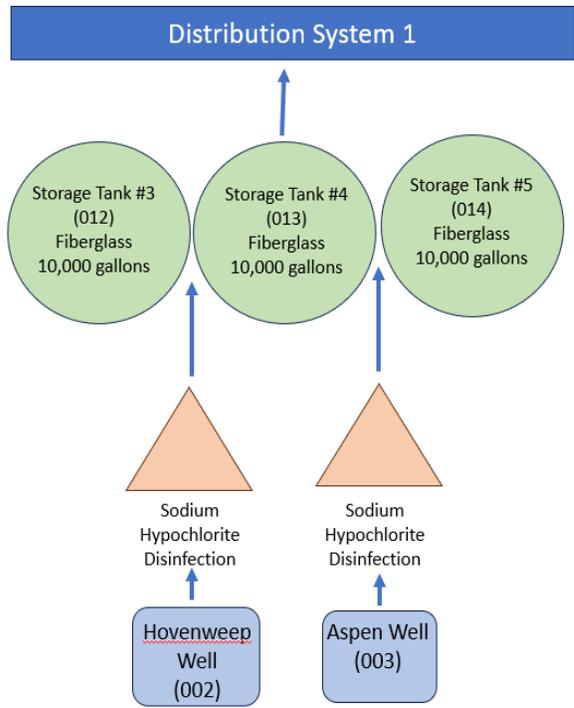
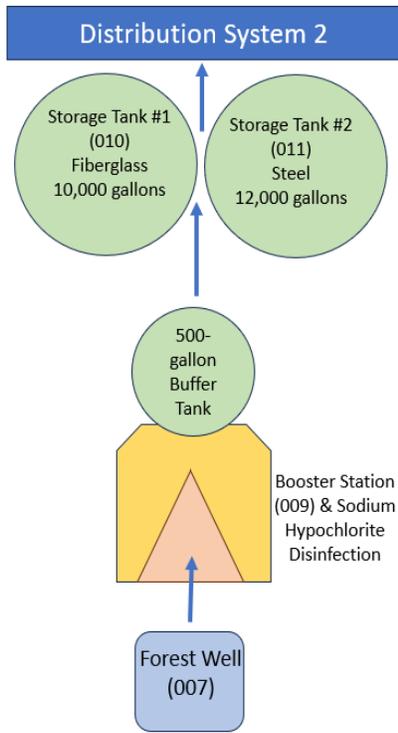
7. **Notes & Recommendations:** It is highly recommended that the unchlorinated Hovenweep Well – 002 discharge line be confirmed as out of service and isolated to prevent serving undischlorinated water.

Recommended Action: Sierra Los Pinos HOA should investigate the destination of the unchlorinated discharge line and isolate it to remove it from service.



Photograph 12. Sierra Los Pinos HOA

Description: Hovenweep Well – 002 has a discharge line shown with the callout arrow that bypasses disinfection.



**Sierra Los Pinos HOA Water System
NM3565423**



Sanitary Survey Corrective Action Plan (CAP)

Ground water systems must submit a CAP within 30 days of issuance of the sanitary survey report.

Surface water and GWUDI systems must submit a CAP within 45 days of the issuance of the sanitary survey report.

PWSS Name	Sierra Los Pinos HOA
PWSS ID	NM3565423
Sanitary Survey Date:	March 3, 2025
Date report was issued:	May 19, 2025

Deficiency Listing– Shaded Section is to be filled out by water system representative.

Deficiency Code	Description	Choose one (1) and fill in date:	
		Date deficiency was addressed	Expected date of completion
001K	The Forest Well (#007) lacks a well casing vent and has loose sanitary seal bolts.		
001K	The Aspen Well (#003) lacks a proper sanitary vent.		
004B	Failure to provide an ERP for review.		
004C	Failure to provide an O&M plan for review.		
001Q	Failure to properly construct the access hatch to prevent the entry of contaminants. This deficiency applies to storage tanks #1 (#010), Storage Tank #2 (#012), Storage Tank #3 (#013), Storage Tank #4 (#014), Storage Tank #5 (#015)		
001B	Failure to provide an overflow line to prevent contaminants from entering the tank. This deficiency applies to storage tanks #1 (#010), Storage Tank #2 (#012), Storage Tank #3 (#013), Storage Tank #4 (#014), Storage Tank #5 (#015)		
001N	Failure to maintain the storage tank #2 (#011) in a manner that is free of corrosion.		
Comments:			

If a deficiency has been addressed, submit documentation to the compliance staff listed below.

Submit this form to:

Wayne Jeffs at wayne.jeffs@env.nm.gov

Corrective Action Plan submitted by:

Signature

Printed Name

Date