

1 PUBLIC HEARING
2 STATE OF NEW MEXICO
3 OIL CONSERVATION COMMISSION
4

5 Pecos Hall, 1st Floor, Wendell Chino Building
6 1220 S. Saint Francis Drive
7 Santa Fe, New Mexico
8

9 IN THE MATTER OF:

10 PROPOSED AMENDMENTS TO 19.15.2, 19.15.5
11 19.15.8, 19.15.9 and 19.15.25 NMAC
12
13

14 TRANSCRIPT OF PROCEEDINGS

15 October 28, 2025
16
17

18 HEARD BEFORE:

19 HEARING OFFICER FELICIA ORTH
20

21 COMMISSION MEMBERS:

22 ALBERT CHANG, Chair
23 GREGORY BLOOM, Member (virtual)
24 DR. WILLIAM AMPOMAH, Member
25

COUNSEL TO THE COMMISSION:

MR. ZACHARY SHANDLER, ESQ.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S

FOR THE APPLICANTS:

WESTERN ENVIRONMENTAL LAW CENTER
409 East Palace Ave., #2
Santa Fe, New Mexico 87501

BY: Tannis Fox
fox@westernlaw.org
Kyle Tisdell
tisdell@westernlaw.org
Matt Nykiel
nykiel@westernlaw.org

FOR NEW MEXICO OIL CONSERVATION COMMISSION:
NM ENERGY, MINERALS AND NATURAL RESOURCES DEPT.

1220 South St. Francis Drive
Santa Fe, New Mexico 87505
BY: Jesse K. Tremaine
jessek.tremaine@emnrd.nm.gov
Chris Modander
chris.moander@emnrd.nm.gov

FOR INDEPENDENT PETROLEUM ASSOC. OF NM:

HINKLE SHANOR, LLP
P.O. Box 10
Roswell, New Mexico 88202
BY: Andrew J. Cloutier
acloutier@hinklelawfirm.com
Ann Tripp
atripp@hinklelawfirm.com

FOR OXY USA, INC.:

HOLLAND & HART, LLP
P.O. Box 2208
Santa Fe, New Mexico 87504
BY: Adam G. Rankin
agrarkin@hollandhart.com
Aaron Tucker
Atucker@hollandhart.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S (Cont'd)

FOR NM OIL & GAS ASSOCIATION:

BEATTY & WOZNIAK, PC
500 4th Street, NW, Suite 1,000
Albuquerque, New Mexico 87102
BY: Miguel A. Suazo
msuazo@bwenerylaw.com
Jacob Everhart
jeverhart@bwenerylaw.com

FOR EOG RESOURCES, INC.:

BRADFUTE SAYER, PC
P.O. Box 90233
Albuquerque, New Mexico 87199
BY: Jennifer L. Bradfute
jennifer@bradfutelaw.com
Matthias Sayer
matthias@bradfutelaw.com

EOG RESOURCES, INC.
125 Lincoln Ave., Suite 213
Santa Fe, New Mexico 87501
BY: Jordan Kessler
jordan_kessler@eogresources.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

PAGE

TRANSCRIPT OF PROCEEDINGS.....	5
OPENING STATEMENT	
By Mr. Suazo.....	167
THE WITNESSES	
TIFFANY WALLACE	
Direct Examination by Mr. Rankin.....	15
Cross-Examination by Ms. O'Grady.....	61
Cross-Examination by Mr. Tremaine.....	79
Cross-Examination by Mr. Moore.....	109
Cross-Examination by Mr. Cloutier.....	111
Cross-Examination by Ms. Suazo.....	114
Redirect Examination by Mr. Rankin.....	116
Examination by Commissioner Ampomah.....	121
KELLY MONTGOMERY	
Direct Examination by Mr. Tucker.....	136
Cross-Examination by Ms. O'Grady.....	146
Cross-Examination by Mr. Hall.....	149
Cross-Examination by Mr. Moore.....	155
Redirect Examination by Mr. Tucker.....	158
Examination by Commissioner Ampomah.....	159
Examination by Commissioner Bloom.....	163
DAN ARTHUR	
Direct Examination by Mr. Suazo.....	175
Cross-Examination by Mr. Tisdell.....	255
ADMITTED EXHIBITS	
Oxy, USA Exhibits A and B.....	78
Oxy, USA Exhibit C.....	146
NMOGA Arthur Direct Testimony/Appendix A and	
Rebuttal Testimony/Appendix A.....	238
TRANSCRIPT CERTIFICATE.....	288

1 (On the record at 9:00 a.m.)

2 TRANSCRIPT OF PROCEEDINGS

3 HEARING OFFICER ORTH: Good morning. My
4 name is Felicia Orth, hearing officer appointed by
5 the Oil Conservation Commission to conduct a hearing
6 in OCC 24683 relating to well plugging and financial
7 assurance.

8 We are on day seven of the hearing and
9 have come to another public comment session. A few
10 things about public comment. I will ask you to spell
11 your first and last name for the transcript. I will
12 ask you, pursuant to Commission rules, to swear or
13 affirm that you will tell the truth and I will ask
14 you to keep your comments to three minutes.

15 In the event you have more to say, you
16 have at least the rest of this week to submit written
17 public comment to the Commission administrator,
18 Sheila Apodaca.

19 So I have four names of folks who
20 indicated to Ms. Apodaca that they wish to speak
21 during this session, Ella Joan Fenoglio.

22 Thank you, Ms. Fenoglio. Can you unmute
23 yourself? You should have permission to unmute
24 yourself. And you might have to press
25 control-shift-M to unmute. That apparently works for

1 some folks.

2 MS. FENOGLIO: Hello?

3 HEARING OFFICER ORTH: Yes.

4 MS. FENOGLIO: Can you hear me now?

5 HEARING OFFICER ORTH: Yes, I can. Thank
6 you very much. Would you spell your first and last
7 name, please, for the transcript.

8 MS. FENOGLIO: Most certainly. Ella Joan,
9 E-L-L-A, J-O-A-N. And my last name is Fenoglio, F,
10 as in Frank, E-N-O-G-L-I-O. How would I open my
11 video?

12 HEARING OFFICER ORTH: Well, there should be
13 a button that has a little camera sign on it that
14 allows you to turn on your camera.

15 In the meantime, do you swear or affirm
16 to tell the truth?

17 MS. FENOGLIO: I do so swear, Madam.

18 HEARING OFFICER ORTH: All right.

19 MS. FENOGLIO: I see no camera button. I'm
20 new to Teams, so I'm probably not doing this right.
21 Okay. I can speak when you're ready.

22 HEARING OFFICER ORTH: Anytime. Thank you.

23 MS. FENOGLIO: My name is Ella Joan
24 Fenoglio. I'm a member of the Sierra Club, and I am
25 here to speak about the proposed bonding and cleanup

1 rule changes that are being considered. I'm here to
2 comment in support of rulemaking to modernize
3 New Mexico's bonding and cleanup rules.

4 I was taught as a young child, you clean
5 up your messes, put away your toys. I'm asking that
6 you make rules that require oil and gas providers and
7 anyone else who opens wells and then closes them
8 without cleaning them up, that that be required at
9 the beginning, a bond sufficient to cover the cost.

10 That's very important that we hold our
11 corporations that come to New Mexico to leave
12 New Mexico clean and pristine, the way they found it.
13 And I invite you to make those rules in favor of
14 New Mexico's environment. Thank you.

15 HEARING OFFICER ORTH: Thank you very much.

16 The next name I have is Shannon Patrick.
17 Is Shannon Patrick on the platform? Perhaps not.

18 Okay. Lawrence Hittle.

19 MR. HITTLE: Yes. My name is Lawrence
20 Hittle, L-A-W-R-E-N-C-E, H-I-T-T-L-E.

21 HEARING OFFICER ORTH: Do you swear or
22 affirm to tell the truth?

23 MR. HITTLE: Yes I do.

24 HEARING OFFICER ORTH: Thank you. Go ahead.

25 MR. HITTLE: My name is Lawrence Hittle, and

1 I've lived in New Mexico for 68 years. It's
2 beautiful state. I've owned two businesses. I've
3 worked in a cheese manufacturing plant. And I have
4 taught at Eastern New Mexico University as an adjunct
5 professor for industrial engineering technology.
6 I've raised my family here. New Mexico is very
7 important to me.

8 One of the things that does make me sad
9 is that our level of public education is low. And
10 the oil and gas industry does tremendously support
11 our education system. So I'm concerned that
12 regulations are completely piled on to the oil and
13 gas industry or any other industry because
14 regulations in and of themselves don't do much good.

15 I was an electrical contractor and I
16 know that when you make regulations, they need to be
17 specific. You need to have very clear guidelines.
18 And I want to make sure that whatever you consider,
19 that they are clear and not open-ended. We don't
20 want to put a burden on anything.

21 I understand that the oil and gas
22 industry has put in over \$80 million is available for
23 plugging wells. What I think is that the oil and gas
24 industry has put in a lot to New Mexico and to keep
25 the territory clean. It's a beautiful state. But

1 I'm concerned about over-regulating any industry,
2 whether it's oil and gas or whatever. Everything has
3 to be specific.

4 So I ask that you be very careful about
5 the recommendations on this. We need to keep the
6 state clean, but we also need to make sure that we
7 don't hinder our industries, whatever industry,
8 because as we do, we raise the cost of living for all
9 of the citizens of New Mexico. We make the expenses
10 of running and operating a business higher.

11 So as you consider the proposals before
12 you, I would ask that you consider making it very
13 specific and not open-ended, not open to
14 interpretation later. Thank you so much.

15 HEARING OFFICER ORTH: Thank you,
16 Mr. Hittle.

17 Gary Park?

18 MR. PARK: Yes.

19 HEARING OFFICER ORTH: Hello. Would you
20 spell your first and last name, please.

21 MR. PARK: Gary, G-A-R-Y. Parke, P-A-R-K-E.

22 HEARING OFFICER ORTH: Do you swear on her
23 affirm to tell the truth?

24 MR. PARK: I swear to tell the truth.

25 HEARING OFFICER ORTH: Thank you. Go ahead.

1 MR. PARK: Good morning, commissioners. I'm
2 happy for this opportunity to speak to you. My name
3 is Gary Park. I was born and raised in Hollywood,
4 California. I'm retired military. I graduated from
5 the University of Oklahoma with a bachelor's degree
6 in computer science.

7 I vacationed in New Mexico a number of
8 times over the years and was thrilled when I got
9 hired by Anderson Consulting in 2000 to program for
10 the state, supporting CYFD. This experience gave me
11 some insight into the quality of education of our
12 youth.

13 So I retired in 2011 from the private
14 sector to follow my passion and become a New Mexico
15 state public school teacher and give back to my
16 community. I was one of the founders of the charter
17 high school master's program located at Santa Fe
18 Community College.

19 Each year, I would become more
20 disappointed in New Mexico public education as the
21 state continued to rank in the bottom 40s of the 50
22 states. Each year, we would hire new promising
23 teachers only to see them leave because they did not
24 make enough money to live in New Mexico or Santa Fe.
25 I saw promising students quit high school, take the

1 GED and go to college as they felt they were wasting
2 their time in public school. I retired from teaching
3 in 2015.

4 So today I'm pleading with you to not
5 add any more regulations to New Mexico oil and gas
6 that will decrease their money they pay to our public
7 education. We desperately need, if anything, to
8 increase and not decrease the moneys we get from oil
9 and gas. Thank you.

10 HEARING OFFICER ORTH: Thank you, Mr. Parke.

11 Is there anyone else on the platform who
12 would like to offer public comment during this
13 session? Our next session will be today at 4:00 p.m.

14 If you have called in and would like to
15 raise your hand, you can press star 5. I see Alison
16 Riley has raised her hand.

17 Sheila, can you find Alison Riley?

18 MS. RILEY: Good morning. Can you hear me?

19 HEARING OFFICER ORTH: Yes. Would you spell
20 your first and last name for the transcript, please.

21 MS. RILEY: Yes. My first name is Alison,
22 A-L-I-S-O-N. Last name is Riley, R-I-L-E-Y.

23 HEARING OFFICER ORTH: Do you swear or
24 affirm to tell the truth?

25 MS. RILEY: Yes.

1 HEARING OFFICER ORTH: Thank you. Go ahead.

2 MS. RILEY: Thank you. Good morning. My
3 name is Alison Riley. I'm the vice president of
4 government relations and policy with the New Mexico
5 Chamber of Commerce.

6 The Chamber supports reasonable
7 stewardships of New Mexico's natural resources and
8 the need for operators to meet their reclamation and
9 plugging obligations. However, the proposal to
10 increase bonding requirements to \$150,000 per
11 inactive or high risk well is neither balanced nor
12 practical and carry serious economic consequences.

13 The rule would disproportionately harm
14 small and mid-sized producers, who make up the
15 majority of New Mexico's independent oil and gas
16 companies. These are responsible operators who
17 already comply with existing bonding and reclamation
18 standards.

19 Requiring individual well bonds at
20 \$150,000 would tie up millions of dollars in
21 nonproductive capital funds that would otherwise go
22 into investing emissions reduction technology. The
23 financial burden would drive production declines,
24 particularly in marginal and low producing wells,
25 many of which are still safely operating and

1 contributing tax revenue to the state. Shuttering
2 those wells would mean lost royalty income for the
3 state, less funding for education, and fewer jobs in
4 rural communities where energy development remains
5 one of the few stable economic drivers.

6 New Mexico already has a comprehensive
7 regulatory framework through the Oil Conservation
8 Division that includes bonding inspection and
9 enforcement mechanisms. The better solution is
10 targeted reform and improved enforcement.

11 Finally, this proposal risks making
12 New Mexico less competitive with neighboring states.
13 The industry competes regionally for investment and
14 companies can easily shift drilling programs to
15 Texas, Oklahoma, where bonding requirements are far
16 lower. If that happens, New Mexico loses not only
17 investment, but also the ability to influence best
18 practice and environmental outcomes.

19 The Chamber supports accountability. We
20 support responsible bonding. This proposal would do
21 more harm than good, shrinking investment, reducing
22 production and ultimately undermining the very
23 revenue streams that fund environmental restoration,
24 education and infrastructure.

25 We urge regulators to work with

1 industry, local governments, and economic development
2 partners to craft a bonding framework that is both
3 realistic and environmentally responsible.

4 Thank you for your time and considering
5 the business community's perspective.

6 HEARING OFFICER ORTH: Thank you, Ms. Riley.

7 Is there anyone else on the platform who
8 would like to offer comment at this time? Our next
9 opportunity will be 4:00 p.m.

10 Okay. And I don't believe I see anyone
11 in the room here to offer public comment.

12 So we'll move back to the technical
13 case. Let's see. Mr. Rankin.

14 MR. RANKIN: Good morning, Madam Hearing
15 Officer. Good morning, commissioners.

16 Yes, we have two witnesses today,
17 Ms. Tiffany Wallace, who is with us in person. And
18 then Ms. Kelley Montgomery, who is going to be
19 joining us remotely, as she's abroad in London today.

20 Helping me put on our case for Oxy is my
21 partner from our Denver office, Mr. Aaron Tucker.
22 He'll be handling Ms. Montgomery's presentation and
23 her testimony. And I'll be presenting Ms. Tiffany
24 Wallace.

25 So with that, I ask that Ms. Wallace

1 take the stand, and we'll proceed.

2 HEARING OFFICER ORTH: Thank you. So much.

3 Spell your first and last name for the
4 transcript, please?

5 Do you swear or affirm to tell the
6 truth?

7 THE WITNESS: I do. Thank you so much.

8 Go ahead, Mr. Rankin.

9 TIFFANY WALLACE,
10 having first been duly sworn, testified as follows:

11 DIRECT EXAMINATION

12 BY MR. RANKIN:

13 Q. Good morning, Ms. Wallace. Can you please
14 state your name for the record?

15 A. My name is Tiffany Wallace.

16 Q. And by whom are you employed?

17 A. I am employed by Oxy, USA, Incorporated,
18 which we'll call Oxy for short.

19 Q. Are you familiar with the application filed
20 by the applicants in this matter?

21 A. I am.

22 Q. And is a summary of your education and work
23 experience as a petroleum engineer included in your
24 direct testimony?

25 A. Yes, it is.

1 Q. Just at a very high level, you've got some
2 experience testifying on rulemaking in front of the
3 Commission, right?

4 A. I do.

5 Q. And do you have any changes or
6 clarifications -- sorry. And your testimony,
7 actually, is attached to Oxy's exhibit packet as
8 Exhibit B, correct?

9 A. Yes.

10 Q. And you also filed rebuttal testimony, which
11 we'll get to shortly after that, correct?

12 A. Yes.

13 Q. Do you have any changes or clarifications to
14 your direct testimony?

15 A. No.

16 Q. If you would, just explain to us and the
17 Commission, what is Oxy's overall position on the
18 applicant's proposed financial assurance rulemaking
19 that they're proposing here today?

20 A. Sure. Oxy does not oppose the petition's
21 hope to increase financial assurance for active and
22 inactive wells. However, we do feel there's three
23 areas that go too far with regard to the statute.

24 The first is creating the new category,
25 the new marginal category. The second is in the

1 provision with the 15 percent of an operator's
2 portfolio being categorized as marginal, then
3 including non-marginal active wells as part of the
4 bonding requirement. And then the third is the
5 removal of the two-year period for wells in temporary
6 abandonment status, the removal of them outside of the
7 statutory bonding requirement, the blanket bond.

8 And I'm not sick. I just want to say
9 that. I thought it was really smart to get vaccinated
10 right before this. So don't worry. I'm not
11 contagious. I'm just froggy. It's okay. That's for
12 Commissioner Bloom, who's sick at home.

13 Q. Thank you, Ms. Wallace. So among the
14 concerns, there's actually a concern about whether the
15 proposed rules are overbroad or not targeted,
16 generally.

17 A. Yes.

18 Q. Now, I'm going to pull -- I've got your
19 slide deck up and I'm going to ask you to walk through
20 these slides. And just tell me when you want me to
21 advance.

22 Just give us a general overview here.
23 What concerns does Oxy have with the proposed changes
24 to the first section that's going to be modified,
25 19.15.2.7?

1 A. Yes, and for the Commission's benefit, we
2 tried to do this to be clear and obvious, because
3 there's a lot of material here. So I give you this
4 summary slide up front, in front of every one of these
5 sections, as a kind of the punch line. Sometimes I'll
6 move us just through the slides because I'm going to
7 try to be sensitive to the fact that a lot of this has
8 already been covered, so I will try not to repeat any
9 of it.

10 So our concerns in this provision -- in
11 fact, why don't we just go ahead and move to the next
12 slide. It'll show us striking both of those
13 definitions, beneficial purposes and marginal wells.

14 This is because we don't believe
15 beneficial purposes is necessary, the definition
16 beneficial purpose or beneficial use. We believe that
17 the provision within the petition explains adequately
18 what the expectation is. We have seen the Division
19 use these terms in prior rulemakings and not have the
20 need to define. And we would worry that, as we've
21 seen as part of this hearing, that if we don't land
22 the definition right, we could cause more harm than
23 good.

24 And then for marginal well, we've
25 discussed that. And, again, I'm not a lawyer; I've

1 just been part of all these conversations. And Oxy
2 believes that marginal well is -- that defining that
3 is not in compliance with the statute. So we move to
4 strike that definition.

5 Q. Next section here, where Oxy's gotten
6 proposed modifications to the proposed rule is
7 19.15.5.9. Just give us an overview here of what
8 proposed modifications Oxy's seeking.

9 A. Sure. And you're welcome to move to the
10 next one. We just strike it, and then I'll explain.

11 So in this one, the proposal here is to
12 change the definition of inactive oil from 15 months
13 to 13 months. I've heard the Division's discussion of
14 why they feel that we should do that. I think that
15 really there's no evidence or problem or evidence of
16 abuse that's been presented for that two-month change.
17 We just don't feel that it's necessary and we move to
18 just keep the rule as it is. It's a timeline that
19 industry is used to for its purposes. There are very
20 big decisions to make.

21 And I'm not certain, and I think it was
22 even brought up yesterday, that the 60 days would do
23 anything more or less other than create a big change
24 in process that I'm not sure the evidence has been
25 presented that there's a problem.

1 Q. Yeah, I think Mr. Powell testified that in
2 the life of the well, 60 days is not a big impact,
3 correct?

4 A. Yes.

5 Q. Next slide here, tell us what concerns or
6 changes Oxy's proposing to 19.15.8.9?

7 A. Yes, and this is another one where, again,
8 all of this is part of something that you guys can
9 read later.

10 But if we want to go to the next slide,
11 there's a lot going on in this one. If we skip to --
12 oh, actually, don't. We broke those out. I'm sorry,
13 guys. Okay. Go back to the summary and I'll walk
14 through it.

15 So really, the intent, as I understand
16 it, in all of our discussions, both as part of the
17 rulemaking and then during this hearing, is to
18 incentivize quicker decisions on risky wells and
19 prevention of risky operators from continuing poor
20 behavior in this state.

21 And so the attempt here was to create
22 this new category, which, again, we would move to
23 strike because of the statute. We think that it can
24 cause some unintended consequences with regard to
25 waste. And I can go a little bit more specific into

1 that.

2 We've heard primary resource recovery
3 being a potential risk. I think also there's economic
4 waste and there's some compounding effects that can
5 happen to mineral or surface owners if operators are
6 forced to drill new wells to recover the same reserves
7 instead of the existing even primary resources, the
8 wells that are already there.

9 And so I think those couple things at
10 risk, along with the legal arguments that I am not an
11 expert to make, are why we oppose the marginal well
12 definition.

13 Q. Okay. Let's go walk through the specific
14 language modifications. So this first section here,
15 Oxy doesn't have any proposed modifications to the
16 Subpart A, correct?

17 A. Correct.

18 Q. Next portion here, walk us through what
19 Oxy's proposed changes are and the justifications for
20 them?

21 A. Yes, so this is the one that I was just
22 discussing. It's the full strike of the marginal well
23 section and the creation of the category for all the
24 reasons. We think if the -- I guess in short, I'd say
25 marginal wells are not bad. I mean, maybe some could

1 be, but by definition they're not bad. And so we need
2 to be very careful here that we're not overstepping
3 the mark, and that if our intent is to target the
4 riskiest of wells, we have to be very careful here
5 that we're not overstepping and also catching wells
6 that are not bad.

7 And I agree with Mr. Powell, by the way,
8 on the marginal well term. We should probably change
9 it.

10 Q. So one of the concerns the division has, and
11 as you may recall from your time as a regulator, is to
12 prevent the drilling of unnecessary wells. Explain,
13 if you would, just briefly how your concerns about
14 this rule could impact that obligation of the division
15 to prevent the drilling of unnecessary wells. You
16 alluded to it briefly in your introduction.

17 A. Right. So my prior experience is
18 development of full assets, and so I look at that not
19 only from the operations perspective, which you heard
20 very much from Mr. Wrinkle, but I also look at the
21 full resource potential and all of the future
22 potential of the field.

23 And so when we have either additional
24 resources that can be captured or we see a new
25 technology that can capture additional resources,

1 having wells that exist out there that are still
2 testing safely to be able to use is much more economic
3 to catch those resources than it would be to drill all
4 new wells.

5 Q. I think you did touch on this, but I want to
6 make sure it's clear, the concern about unrecovered
7 reserves. So if wells are prematurely plugged, what's
8 the concern there in terms of what reserves that may
9 remain unrecovered?

10 A. Right, it's waste of resource.

11 Q. Because it may be too costly to drill a new
12 well, correct?

13 A. Correct.

14 Q. I think further on this slide, Ms. Wallace?
15 I think we've covered everything.

16 A. No. I think we're good on this one.

17 Q. Next slide here, same provision, but further
18 down, looking at new provision, Subpart E, E and F.
19 Just explain, if you would, how this relates to -- or
20 what Oxy's concerns are and proposed modifications
21 here?

22 A. Yes, I'm making sure that I'm on the right
23 one. Okay. So this is the temp abandonment
24 provision. So this is -- I touched on this at the
25 very beginning. This is the requirement to add

1 additional bonding to approved temporary abandonments
2 in less than two years. And we don't believe that
3 that complies to the statute.

4 I'd also like to point out that when an
5 operator gets these wells approved in a TA status,
6 they go to the Division and they present a case for
7 it. They present casing and cement data. Right?
8 They prove mechanical integrity. And so the Division
9 has to look at these and they have to approve of them.

10 So to me, it doesn't make sense that as
11 soon as they get approved, that they would then be
12 considered risky enough to add additional bonding to
13 them that should be already protected by the statute.

14 Q. And just to be clear, your understanding on
15 how the statute works is that it gives those initial
16 wells that are first put into TA status two years to
17 remain under the blanket bond, correct?

18 A. That's how I understand it.

19 Q. And so because it was just vetted and just
20 reviewed by the Division as being appropriate and
21 protective of against waste and correlative rights,
22 there would be no need to impose \$150,000 one-well
23 financial assurance on those wells, correct?

24 A. Yes. Because if the intent is to target the
25 riskiest of wells and the Division just approved for

1 them to be okay enough to be put in TA status, I think
2 that they're covered by the blanket bond sufficiently.

3 Q. And that's been your understanding, is the
4 statute expressly provides for them to remain under
5 the blanket bond for two years before additional
6 financial assurance would be required.

7 A. Yes.

8 Q. Anything further on this slide? I think
9 that's the only issue that Oxy has raised with this
10 portion of the provisions, correct?

11 A. Correct.

12 Q. Okay. Next slide here addresses the final
13 portion, I think, of this provision of the rule,
14 19.15.8.9, Subpart G. If you would just explain what
15 Oxy's concerns are with the consumer price index, just
16 for clarification of the record.

17 A. Right. So I guess the first concern is that
18 the CPI couldn't apply to the blanket financial
19 assurances if they were already maxed out at the cap
20 250,000, and so you would not be allowed to add more.

21 So our adjustments here were to make
22 that clear, that they only apply to, I'm reading, the
23 inactive wells and the wells in temporary abandonment
24 status for more than two years, just to make that
25 clear.

1 And then the other change that we made
2 is you'll see towards the end, we changed "shall" post
3 on its website to "may" post on its website. And we
4 just felt like we wanted to leave the discretion at
5 OCD to decide when and if the CPI changes were
6 significant enough to make that change, rather than
7 requiring it every year. Because it could be
8 burdensome.

9 Q. Next slide here. What's Oxy's position
10 regarding the proposed operator registration and
11 certification requirement?

12 A. So we support the revisions to ensure that
13 operators seeking authority are operating properly and
14 do not have a history of, you know, repeat offenses,
15 let's call it.

16 However, we do make some modifications
17 to the section. Let's go to the next slide. I think
18 it would be better. So this is where in discussions
19 with WELC and OCD, we talked through this.

20 Our concern was that it was too broad,
21 the initial language was too broad, and that an
22 operator like Oxy or any, at any given time, could not
23 say for certain at any given second they were in
24 compliance across all states and federal and global.

25 And so we wanted to restrict that, while

1 also keeping the intent to prevent the repeat
2 offenders from coming into New Mexico. And so what we
3 did here is we said -- we changed who was going to be
4 doing the certifying. I think that will come up a
5 little bit later, too. It was previously officer,
6 director, partner. We're saying "authorized
7 official." Let me be clear on that.

8 And we wanted the discretion to be left
9 with the operator on who they decide could best be
10 held accountable for this certification. For us, I
11 haven't made this decision. Oxy will make this
12 decision. But logically, I would think it's our
13 regulatory director who oversees that business. And
14 we think that was clearer and a more appropriate
15 person that could be held accountable.

16 And then the last section you see that
17 we strike compliance with federal, state and oil and
18 gas law regulations. I touched on this, but I think
19 any operator could stand here and say that we will
20 constantly get notices, state or federal, that will
21 allege a non-compliance that sometimes are not a
22 non-compliance. Sometimes it's a lost in translation
23 on data or something that when you speak and you work
24 it out, it's actually not a non-compliance.

25 And so we thought it was too far of a

1 reach to say that -- we think striking this makes it
2 clearer.

3 Q. And based on your discussions and
4 negotiations with applicants and with the Division,
5 they've accepted those proposed changes, correct?

6 A. Yes.

7 Q. And we'll address some of this more on
8 surrebuttal. There's a couple of things based on
9 Mr. Powell's testimony I want to clarify, but we'll
10 address that on the surrebuttal.

11 Next slide here also is a 19.15.9.8, and
12 it, again, deals with operator registration. I think
13 you can just touch on this briefly, because I think
14 you mostly covered it already.

15 A. Yeah, it's the same change made here as well
16 for the same reasons.

17 Q. Next slide, slide 14, what's Oxy's position
18 regarding applicants proposed annual 25 percent
19 interest requirements as part of the operator
20 registration process?

21 A. So, we changed this. We believe that the
22 certification at the time of registration and transfer
23 is sufficient if, again, the goal here is to prevent
24 the repeat offenders. If the OCD has the ability to
25 check that on the way in and at various points, we

1 think that annual, I think it's annual, that yes,
2 annual is too burdensome, both for the Division and
3 for anyone in operations.

4 We don't oppose the requirement for
5 annual disclosure, though.

6 Q. I believe this is another instance where
7 applicants in the Division have accepted the proposed
8 modifications by Oxy; is that correct?

9 A. I believe so, yes.

10 Q. Next slide here, slide 15, is 19.15.9.9.
11 This, again, deals with the same area, change of
12 operator provisions, just at a high level. I think
13 it's the same things you've touched on already, but
14 just give us an overview of what Oxy's proposal is and
15 whether applicants and the Division have accepted
16 those changes.

17 A. Yes, the same changes, same reasons.

18 Q. Next slide, 15 here, I think same thing,
19 you're looking at a modification to change who can
20 authorize the certifications or change of operator.
21 Again, this is a situation where the applicant and OCD
22 has agreed with Oxy's proposed modifications, correct?

23 A. Correct.

24 Q. This one is a little bit different. I guess
25 next slide, 17, is a little bit different, if you

1 would. This calls for us to review the proposed
2 modifications here to 19.15.9.9 and each subsection
3 and the justifications for them.

4 A. Yeah, the best I can tell is this is -- it's
5 a clean-up section, I think I'll call it. I'm not
6 sure why WELC proposed removal of C(2). They're
7 adding --

8 Q. I think it's the next slide.

9 A. The next slide shows it, yes. Do you want
10 me to touch on that now or just wait.

11 Q. Yeah, go ahead and touch on it now. I can
12 toggle between them, if that's helpful.

13 A. Yeah, there was -- we're not sure why the
14 removal of C(2). There's a section D that you'll see
15 in a minute that was added in, but essentially it's
16 stated just slightly differently.

17 Our proposal would be that we are fine
18 keeping C(2). We are fine if you want to strike C(2)
19 and add D in, but one of them has to be there.

20 Q. So if I slide to the next slide here, 18, I
21 think it's actually E addresses what would otherwise
22 be in C(2). So your point is either E or C(2) should
23 be included in the new rule, right?

24 A. Correct.

25 Q. Other than that, were there any other

1 modifications that Oxy's proposing I think in C(3)?

2 A. C(3) is just the change that we discussed in
3 the prior slides, same change, same reasons.

4 Q. Nothing further on this slide then, right?

5 A. Nothing further.

6 Q. And the only changes on the subsequent
7 revision is just the renumbering, depending on whether
8 or not the Commission chooses C(2) or not, correct?

9 A. That's correct.

10 Q. On to the next slide, number 19. This is
11 the new section, 19.15.25.8. Just give us an overview
12 of Oxy's proposed modifications and justifications in
13 this section.

14 A. Yes. And for this one, let's check the next
15 slide because I think the change is there. Yes.
16 Okay.

17 So this is the time change slide of
18 the -- or the provision that talks about changing from
19 90 days to 30 days for plugging and abandoning wells.

20 We heard some testimony on this this
21 week. I don't disagree with the testimony, but,
22 again, I'd say no evidence was presented that it
23 necessitates moving from 90 days to 30 days. And I'd
24 say if there isn't evidence of a problem or an abuse
25 that the Division's trying to sort, I would say let's

1 just leave it.

2 And then the continuously inactive.

3 I've also heard the testimony on removal and why the
4 suggested removal of that word. I believe it would
5 cause more harm than good to remove "continuously"
6 there. I know what the Division is after, but I also
7 think not defining the well as continuously inactive
8 could be a hazard.

9 Q. Is part of the concern, Ms. Wallace,
10 regulatory certainty? If you move that language, that
11 operators and the regulator no longer have certainty
12 about what exactly that means?

13 A. Yes.

14 Q. Anything further on this slide?

15 A. No.

16 Q. Next slide here, slide 21, addresses
17 19.15.25.9. If you would just review Oxy's
18 modifications here and the justifications for them.
19 Let me know if you want me to go to the specific
20 modifications.

21 A. Yeah, wait here just for a second.

22 So Oxy supports the perceptions of no
23 beneficial use. We think it was a very unique way to
24 try to target the problem. We did make some minimal
25 suggestions here. And I guess, yeah, go ahead, we can

1 go to the next one.

2 We're really trying to maintain, so no
3 changes to this provision. This would be 19.15.25.9.
4 This is really about preserving the flexibility and
5 the discretion within the OCD. I get a little -- when
6 I was a rule maker, I got leery with not having enough
7 specificity within the rules, and I also didn't want
8 as much specificity. It depended on the problem.

9 And so, in this particular case, I think
10 when we're outlining the specific things that the
11 Division is requiring that may not apply to every
12 situation, I would prefer, and Oxy would prefer, to
13 leave the definition in -- or leave the provision in
14 OCD's hands. They can decide which required
15 information they need at the time.

16 Q. And just to be clear, I think Oxy had
17 concerns that the way the rule was proposed, it
18 sounded like this information was mandated in every
19 instance, correct?

20 A. Correct. And in some cases, the data
21 doesn't make sense for the project or for the wells
22 set forth.

23 Q. So the language here is intended to make
24 clear that rather than mandating the specific
25 information identified, it serves as guidance, and

1 that the Division can ask for more or different
2 relevant information, right?

3 A. That's correct.

4 Q. Next slide here addresses another section of
5 19.15.25, here it's section 12. I believe this
6 section deals with the TA status wells.

7 If you would just review and give us an
8 overview of the concerns that Oxy has. I know that
9 Ms. Montgomery is going to be addressing this more
10 directly in her testimony, but just if you would, give
11 us an overview of the modifications and Oxy's concerns
12 and justifications for the proposed modifications.

13 A. So, the petition is wanting to limit how
14 long a well can be held in TA status. And at the
15 moment, they can be granted extensions in five-year
16 increments. And the provision and the rule and the
17 petition would say it would be a five plus two is the
18 limit of that.

19 And so what we'll go into is why we feel
20 like that could be of concern to broader projects.
21 Like, for example, EOR which Ms. Montgomery will talk
22 about in fuller detail. But there are also other -- I
23 imagine there are other projects that would need these
24 TA status wells for longer than the five plus two.

25 Q. Next slide here I think gets into the

1 details you just reviewed of what's being proposed by
2 Oxy. And again, a little more detail on the
3 justifications.

4 A. So, Oxy wants to retain the Division's
5 authority to request review and to request data that
6 would support the programs that would be chasing these
7 exemptions. And we hope, we hope staying in TA longer
8 than five plus two years.

9 We do also want the discretion, and
10 you'll see struck at the bottom are a bunch of
11 specific data requirements. This is, again, about
12 retaining discretion with the Division to ask for what
13 they want based off the project that's being put in
14 front of them. And so this is really about them
15 retaining the authority to ask for the data and ask
16 for what data is appropriate to approve these.

17 Q. One of the things I wanted to make sure is
18 drawn out, Ms. Wallace, I think the way the proposed
19 rule was drafted, the initial TA status period could
20 be anywhere from one to five years, correct?

21 A. Correct.

22 Q. And so if it were less than five years, the
23 extension as written could only be two years, right?

24 A. Yes.

25 Q. So it could end up being that TA status as

1 proposed would be something less than the eight-year
2 maximum, right? It could be something.

3 A. That is true. That's their discretion.

4 Q. Right. And what's your view of that
5 limitation?

6 A. I think I haven't seen it. I have not been
7 made aware of any problems with that process now. I
8 know and Kelley, Ms. Montgomery, can speak to that
9 more than I can. But we have provided a lot of data
10 and a lot of sure assurances to the Division to get
11 those approvals. And I can support the Division
12 having discretion at that.

13 Q. So just real quick. On your rationale,
14 you've got four types of information or guidance that
15 would allow for the Division to give extensions to the
16 TA status. In your understanding, is that closely
17 aligned, not totally aligned with what applicants are
18 proposing and their testimony, as well? Do you think
19 we can reach agreement with applicants on some
20 language that would get us to the same place?

21 A. Absolutely. We are doing all of that now as
22 part of our approvals.

23 Q. So we'll work on that going forward. Next
24 slide here is 19.15.25.12. Again, this is another
25 provision that addresses specifically the TA status.

1 Just review the proposed modifications here. I think
2 this, again, touches on what you just discussed at a
3 higher level, specifying that the requested
4 information is not mandated, but it should serve as
5 guidance, correct?

6 A. Right. So this is about -- there are two
7 things going on in here. One is the high level
8 limitation of the amount of years that it can be in
9 approved status.

10 And again, we believe our specific
11 example that we'll be presenting is an EOR project
12 that has 500-and-some-odd wells that we evaluate
13 constantly. We have made changes to that program as
14 we have gone along. But we changed spacing, you'll
15 hear from Ms. Montgomery, that we dropped wells and
16 plugged them because we changed spacing.

17 As we evaluate those 500 wells and how
18 they best develop those resources, we may have those
19 communications back to the Division for when that
20 program changes. But it takes a very long time to
21 understand how that program is going to work. It's
22 also very sensitive to economics.

23 And then the other thing that's
24 happening in this slide is the striking of -- well,
25 I'll just call it allowing discretion for the

1 technical case that is asked for by the Division.

2 Q. Anything further on this side, Ms. Wallace?

3 I don't think so.

4 A. No.

5 Q. Next slide here is 19.15.25.12. Again, this
6 touches on the TA status issue. I believe, again,
7 you've touched on this mostly, but I don't think
8 there's much more to discuss on this slide, but I just
9 want to make sure that we've touched everything here.

10 A. Yes.

11 Q. And just to be clear, part of Oxy's
12 justification is that in every case, these TA status
13 wells have to demonstrate mechanical integrity, right?

14 A. Absolutely.

15 Q. And just so I understand, will you explain
16 for the record, when a well has demonstrated
17 mechanical integrity, what does that mean at a high
18 level for the condition of the well? Just so we have
19 an understanding.

20 A. That it is safe to be out there in the state
21 that it's in and not causing environmental harm.

22 Q. Next slide is slide 28. I guess we're
23 moving into your rebuttal testimony now.

24 Ms. Wallace, in preparation for your
25 rebuttal testimony, did you review the testimony of

1 Division witness, Mr. Justin Wrinkle?

2 A. I did.

3 Q. And what does Mr. Wrinkle say in his
4 testimony about marginal wells?

5 A. He explains that marginal wells have very
6 little value and are mostly being held to hold the
7 lease.

8 Q. And that's the focus of your rebuttal
9 testimony, correct?

10 A. Yes.

11 Q. Explain at a high level Oxy's position on
12 Mr. Wrinkle's testimony in view of the value of
13 Marshall wells?

14 A. I think Mr. Wrinkle's view is very accurate
15 for an ops-centric lens. And I think when you're
16 looking at a full development field, you look at
17 marginal -- you look at any well differently because
18 it's all part of a program.

19 Oxy is not in the marginal well
20 business, but we have marginal wells, and they are
21 very important. They play a very important role as
22 part of our program. And so we still value them. We
23 still see the point in time to, be it because of
24 economics, oil pricing, new technology, a rig next
25 door that happens to be there, we see reasons all the

1 time to go out to lower producing wells and, let's
2 just call it, revamp them by any means.

3 Q. Let's go ahead and get into your overview of
4 your rebuttal testimony. I think this kind of
5 summarizes some of those issues, just review what this
6 slide shows and let us hear a bit more about Oxy's
7 concerns. I think you may have already touched on
8 that.

9 A. This is my marginal wells aren't bad case.

10 Q. Next slide here, provide us, if you would,
11 some specific examples or the case studies that you
12 looked at where Oxy has been able to improve
13 operations in production from some of the marginal
14 wells in its portfolio.

15 A. So when I was thinking about the proposal, I
16 was struggling with how to talk about this, because in
17 my mind, they're just inherently not poor wells. And
18 I wanted to be able to show the Commission that.

19 So this is not statistically
20 significant. It's three wells. I went and asked our
21 regulatory team, "Give me three marginal wells that
22 would meet the definition of this and show me where
23 we've done something with them. Give me three
24 different ones, give me a recent one so that they're
25 not too old. And show me how we, Oxy, have turned

1 wells that were previously marginal into non-marginal
2 wells."

3 And so these are three cases that we'll
4 present here. Again, I know it's not the full
5 program. It's not 100 wells. But I'm just presenting
6 the example that potentially the marginal definition
7 as it is now, we could have some waste and unintended
8 consequences if we go too far with that.

9 So if you want to, is it easier to go to
10 the plots? Okay. So this well, the Harroun 9 Number
11 1 well, this is a well that was, again, defined as a
12 marginal prior by the definition of the days and the
13 volume. And then we refracked it. And you'll see the
14 bump in production that is long and sustained. It's
15 not a blip. It's not temporary. We stop it to
16 refrac. Why and when we choose to do that happens for
17 a variety of reasons.

18 Q. Anything further on the Harroun 9 Number 1
19 well?

20 CHAIR CHANG: A quick interruption, if I
21 could. But once that spike -- if you could go back
22 to that slide real quick.

23 Would it continue to meet the marginal
24 well definition post January of 2020, or February or
25 March, whatever that post spike?

1 THE WITNESS: No. So it's doing the classic
2 hockey stick behavior, right, where it'll decline
3 curve, it'll get a huge spike, and then it'll flatten
4 out. And at the moment, it is not at marginal
5 definition.

6 THE COURT: Okay. So you brought it out of
7 marginal.

8 THE WITNESS: Yes, mm-hmm.

9 BY MR. RANKIN:

10 Q. Yeah. And just to be clear, because it
11 looks like currently it's dipped below the 1,000
12 barrel limit; is that right?

13 A. Yes.

14 Q. But it's producing --

15 A. It's producing solid, mm-hmm.

16 Q. More than a hundred days. So it doesn't
17 meet the "and"?

18 A. Right. Which is, again, why the "and"
19 matters. Because I think both of those criteria are
20 important for defining this.

21 Q. Next well, the FNR 35 Fed 3H Well.

22 A. Okay. So this well had a lot of downhole
23 mechanical problems. We did some artificial lift
24 optimization. And you cannot see it on here because
25 of the production lag. This was a recent one. I

1 asked for the one that we did this year, just so we
2 had a current one. And because of the production lag
3 and the public data, that well is not showing.

4 But I have seen the production. I am,
5 you know, out here telling you that that well is still
6 producing now above marginal status and was actually
7 inclining at the time that I looked at it.

8 Q. So again, the lag is about -- you said --
9 you already told us, like, three months; is that
10 right, between the time you get your proprietary data
11 and the time it gets in public.

12 A. Right.

13 Q. Next well.

14 A. And then this is the last well that was
15 another re-complete. I did have a really fun example,
16 but I decided to stick to the rule of threes where we
17 actually got fracked in a marginal well and was now a
18 non-marginal well, which I found interesting. I guess
19 always the pre-production is nice.

20 But this was another example of a
21 re-completion. Now, a re-completion, just for
22 everyone's benefit, can be that we decided to go --
23 maybe this was a completion that we did years ago that
24 had 10 stages and we've decided that 15 is better.

25 Maybe it's one where, for whatever

1 reasons, we needed to skip a few stages and now we can
2 go back and catch them. And so, for again, multitude
3 of reasons why we might have done this, I don't know
4 the specifics on this, but this was a re-complete
5 where we caught extra production by the additional
6 fracks.

7 Q. Ms. Wallace, just give us an overview, if
8 you would, based on your case study evaluation and
9 Oxy's general view towards the use of these wells and
10 its portfolio of Oxy's position on the utility and the
11 importance of marginal wells in its business?

12 A. I think we need to be careful at lassoing
13 too many of the wells into the marginal category and
14 labeling them as holding little value.

15 It is true that sometimes they hold a
16 lease, but that's not always the case. I think just
17 these three examples show production that would have
18 been lost had we been, you know, forced to plug those
19 wells or another operator forced to plug those wells.
20 I think we just need to be careful to say that they
21 hold little value. There are still resources out
22 there. They are also largely part of a bigger program
23 that could have a variety of reasons to develop them
24 later, be it as part of EORs or anything else.

25 Q. Now, is it true, generally, that marginal

1 wells are sensitive to economics, given the nature of
2 these wells?

3 A. Yes.

4 Q. Next slide here, just give us a quick
5 overview of -- we've heard a lot about Oxy's
6 engagement with both the applicants and the Division.
7 Just give us an overview of some of the efforts and
8 discussions that Oxy's had with those parties and then
9 obviously the places where you weren't able to reach
10 agreement.

11 A. Right. So, no, thank you to the Division
12 and WELC for reaching out to us and having those
13 conversations.

14 Heated legal, fun conversations we had
15 around all of these discussions, all of these topics.
16 But we did come to agreement on 19.15.9.8, operator
17 registration, we've discussed that.

18 And we did come to agreement on
19 19.15.9.9, the change of operator.

20 And then 19.15.25.9, presumption of no
21 beneficial use, which we think is particularly unique
22 and helpful for this, for the intent of this rule.

23 Where we didn't come to agreement, I
24 think we've exhausted it, is the marginal well
25 category and the TAs under the wells and approved TA

1 not being allowed to be captured under the blanket
2 bond.

3 And then the third one is around TA
4 status not being allowed past the five plus two years
5 for things like EOR programs.

6 Q. Yeah, and that last one it sounds like we're
7 on track to maybe get some language that we can work
8 with?

9 A. Yeah, I think so. We were almost there in
10 our prior discussions. I think what it really came
11 down to was how we were going to put language into the
12 rule, like the prior witness that -- I forget his
13 name -- that gave the criteria that we are already
14 doing, how we get that language in there appropriately
15 but not be too restrictive. And then whether or not
16 you have to call out EOR specifically in the rule or
17 allow discretion at the Division.

18 We would argue allow discretion at the
19 Division because it's not just EOR projects for the
20 future. I imagine EOR was considered, dare I say,
21 speculative in its early years, and now it is not.
22 Right? So I want to be careful that we don't put
23 ourselves in a corner and prevent other projects that
24 could happen on the basis of being too specific in the
25 rule.

1 Q. And EOR is a broad range of things, right?
2 It's pressure maintenance, it's water flooding, it's
3 CO2, it's a range of things, and I would say Oxy is
4 also looking at some very advanced approaches with
5 horizontal wells, correct?

6 A. Yes.

7 Q. Now we're going to move into a surrebuttal.
8 We have some short surrebuttal in response to some of
9 the testimony that was provided.

10 Ms. Wallace, did you hear Mr. Powell's
11 rebuttal testimony that given the Division's confusion
12 around the proposed rules definition of marginal well
13 requiring both, this is the "marginal well gate" or
14 the "and/or gate," that given the Division's confusion
15 around the proposed rules definition of marginal well
16 requiring both the production limit of 1,000 barrels
17 of oil equivalent and the days producing limit of 180
18 days, that the Division is open to -- at least was
19 open to simplifying the definition to just a
20 production limit?

21 A. I did hear that.

22 Q. And what's your response to that?

23 A. My response is that I think "and" is
24 important. I think both of those categories are
25 needed to truly determine the risk level of a well.

1 Q. And I think Mr. Powell seems to have
2 modified somewhat his discussion of his rebuttal when
3 he was giving his surrebuttal, that he was sensitive
4 to the need to understand better how operators are
5 managing the well and operating the well based on the
6 number of days, correct?

7 A. Yes.

8 Q. Okay. So you agree with them, that looking
9 at days is important, correct?

10 A. I do. And I also think it's important
11 regarding that definition. I'm not sure if we're
12 going to talk about that, but I think it was
13 Mr. Purvis who testified that at the current and days
14 and volume, it would be 51 percent of operators
15 affected and 2.3, 2.5 percent of the volume affected.

16 And so if you're only using one of
17 those, it is not only an accurate description of the
18 well, but it will also have a broader impact.

19 Q. And just on that same point, tell me a
20 little bit about what Oxy's view is about having that
21 broad impact. I think we talked about there's two
22 different ways to more narrowly target the impact
23 under that marginal law category. Explain, based on
24 the volumes and based on the percentages, what Oxy's
25 view is on that.

1 A. And we've heard it come up all week. I
2 think that if we're not looking to overshoot, it would
3 be appropriate. The threshold right now or the
4 definition of marginal right now is set at 1,000 BOE,
5 I believe.

6 I think the number has been brought up,
7 and it also came up in Mr. Purvis' testimony, that
8 dropping that to 750 would impact .6 percent of
9 production instead of 2.3 percent, if my memory
10 serves. So it's less impactful. You're likely honing
11 in and more narrow on what that definition of marginal
12 is. I think there are other ways.

13 Q. And the 750 line is also with the LFC
14 proposal, correct?

15 A. Correct.

16 Q. Now, did you also hear Mr. Powell's
17 surrebuttal testimony that the calculation to
18 determine whether an operator's well portfolio is
19 within the 15 percent that puts it into the marginal
20 operator category is measured by wells that meet the
21 definition of marginal well and/or inactive wells or
22 some combination of the two?

23 A. Yes.

24 Q. Your understanding is that that calculation,
25 that determination is made by looking at inactive

1 wells, but excluding wells in TA status, correct?

2 A. That's how I understand it.

3 Q. So your understanding is -- and do you
4 believe that the rule that's proposed is clear, that
5 it would not include TA status wells in that
6 determination?

7 A. No, because I started to get worried
8 yesterday around the decision, but my reading of it
9 was that TAs were not included. They already have
10 their own category.

11 Q. Okay. Thank you very much.

12 Now, yesterday during his testimony,
13 Mr. Powell was questioned by NMOGA counsel about the
14 registration and change of operator certification
15 provisions that we discussed, and he was asked whether
16 the intent was to require disclosure of not only
17 noncompliance with orders and settlement agreements.
18 Do you recall that testimony?

19 A. I do.

20 Q. And you heard Mr. Powell testify that, you
21 understand that he testified that the intent was to
22 capture only noncompliance, correct?

23 A. Yes.

24 Q. And in looking at the language that was
25 proposed and agreed upon with the Division and the

1 applicants, where the language, I believe, is used is
2 that they're unresolved orders and unresolved
3 settlement agreements, do you believe that that word,
4 "unresolved," is ambiguous or makes the intent less
5 clear and as proposed?

6 A. Yes. Because over the course of this
7 hearing, people have become confused again. And so we
8 clearly didn't land that. But the intent of all those
9 discussions was about the compliance. So if we can
10 somehow sharpen up that language to make that clear
11 that's as appropriate.

12 Q. And also your understanding was that those
13 orders were intended to be final orders, right,
14 non-appealable or final orders?

15 A. Yeah. Yes. The intent was that operators
16 weren't ignoring orders that were given to them. And
17 sometimes what happens is, you're given an order that
18 has a time increment. And so while you're going
19 through all of that, the idea is not that someone's
20 non-compliant if they're following their order. It's
21 if they're ignoring it, if they're not showing up, if
22 they're not responding, if they're not -- all of that
23 is what we were after.

24 Q. And this is another area where, based on
25 discussions of testimony, that Oxy is willing to

1 continue to talk with applicants to get a final -- any
2 final language proposed as part of the final
3 submission to the Commission?

4 A. Absolutely.

5 Q. Now, did you read and hear the rebuttal
6 testimony of applicant's witness Mr. Adam Peltz, where
7 he testified that the definition of marginal well as
8 being proposed is narrower than the federal definition
9 and probably under-inclusive?

10 A. Yes.

11 Q. And I would touch on this briefly, but do
12 you have an opinion about whether the proposed rules
13 focus on marginal wells and marginal operators is
14 under-inclusive, or if it's appropriately narrow and
15 targeted in its approach?

16 A. I do not believe that it's narrow.

17 Q. Explain, if you would, the concerns around
18 the breadth of the impact that that might have on the
19 industry, including Oxy as well.

20 A. So when I look at Oxy alone, and we've seen
21 several different definitions, and I've seen lots of
22 numbers this week surrounding Oxy's impact based on
23 each of those definitions, but I would surmise that
24 our impact would be a couple hundred wells that we
25 have marginal. It would end up being 50, \$60 million

1 bonds.

2 And so when I think about that and I
3 think about Oxy as an operator, I don't think that we
4 hold risky wells or are a risky operator, and so I
5 think that just, Oxy alone, would show that that
6 definition is not narrow enough.

7 And I commented on it earlier, that
8 Mr. Purvis' testimony would say that it would -- the
9 15 percent would affect 51 percent of the operators.
10 And so then the question is, do we really believe that
11 51 percent of operators are risky in this state?
12 Yeah.

13 Q. And you wouldn't put yourself in that, or
14 Oxy in that category, correct?

15 A. No, I would not.

16 Q. Let's talk a little bit more about the
17 impact to Oxy. Oxy has three different operating
18 entities, correct?

19 A. I believe so.

20 Q. And as you understand it, is the rule clear
21 about how the rule would be applied to companies that
22 have more than one operating entity?

23 A. No. Because, again, yesterday when I
24 started going through the calculations, I started
25 doing the calculations for each entity. I did them as

1 a whole, which was my assumption. And then I started
2 thinking, well, jeez, do I need to do them as each
3 entity. And that would affect us very differently if
4 you're doing each entity versus as a whole.

5 Q. So each of Oxy's operating companies has a
6 different, I'm going to use the acronym OGRID, I can't
7 recall, oil and gas registration, I can't remember
8 what it stands for, but the OGRID number is the
9 operator number, right?

10 A. Right.

11 Q. So Oxy has different operating entities,
12 each with a different OGRID, right?

13 A. Correct.

14 Q. And it's possible that the rule may be
15 applicable to each of those operating entities
16 separately, not as a whole, correct?

17 A. Correct. And our well demographic profile
18 in each of those entities is different. So your
19 percentage of active versus marginal or total versus
20 marginal would be very different in each of those.

21 Q. Now, just as a sort of analogy here, a
22 similar situation came up, I think, in the methane
23 rule, right, the waste rule? And the Division and our
24 Commission in that case took a different approach.
25 Rather than applying it to each separate entity, they

1 had a sort of umbrella, right?

2 A. Right.

3 Q. Is that something that might be appropriate
4 here, or do you think -- I mean, we haven't really
5 discussed this, but that's something that may be at
6 least as ambiguous in the way the rule is proposed,
7 correct?

8 A. I would think so from my lens. I would
9 encourage the lawyers to all look at that to make sure
10 that that works. But I would encourage the operator
11 level application of this.

12 Q. Now, just more detail on the -- you
13 mentioned that, you know, Oxy's looking at potentially
14 50, 60 -- 40, 50, 60 million dollars in financial
15 assurance requirements. And you haven't quite yet
16 studied in detail what the impact would be for each
17 entity, correct?

18 A. No, I briefly looked yesterday, because,
19 again, it was just something that came up to me that
20 said, oh, my goodness, what if this is each entity,
21 that would be very different.

22 And so we're looking at the ballpark
23 range of I think it's 40 to \$60 million in bonds.

24 Q. And one of the entities, I think you and I
25 looked at it, would potentially fall within a -- would

1 become a marginal operator, right, based on the
2 definition?

3 A. Yes.

4 Q. I think that's Oxy, USA, WTP, LTP, correct?

5 A. I'm going to trust you on that. I'm Oxy
6 only.

7 Q. So in that situation, we looked at it, I
8 think it's about 150 wells or so that are under that
9 entity?

10 A. Yes.

11 Q. And based on that, because that entity then
12 would fall within the -- at the 15 percent, would fall
13 into the marginal operator category. They'd have to
14 pay \$150,000 for every well that it operates?

15 A. That's correct.

16 Q. And so in that instance, it would be close
17 to \$22 or \$23 million just for that one entity,
18 correct?

19 A. That's correct. And this is where I believe
20 it's overreaching, because they're all active wells,
21 but they are active non-marginal wells that would now
22 have to be bonded because of that 15 percent. And if
23 it were to be applied to each entity.

24 Q. Now, I want to just talk a little bit about
25 your view that Oxy is a prudent operator and this is

1 overreaching, especially as to Oxy, and there's other
2 operators out there similar to Oxy.

3 Tell us, if you would, just how many
4 wells Oxy has recently plugged in in Mexico.

5 A. Over the last five years, we've plugged
6 about 500 wells. It's about 100 a year.

7 Q. Some of those wells that Oxy plugged, would
8 they include what we've heard today or during the
9 hearing as forced plugging wells that were operated by
10 other Division designated operators who were either
11 unwilling or unable to plug their own wells?

12 A. Some of the, yeah.

13 Q. And, you know, in your opinion, does this
14 policy implicit in this proposed rulemaking make sense
15 to effectively burden operators like Oxy, who are
16 prudent operators that plug their wells and the wells
17 of other operators by creating this marginal well
18 category?

19 A. No, it doesn't.

20 Q. Now, just in summation, given that you
21 believe the marginal well provision is over-inclusive
22 and over-broad and unfairly burdens offers like Oxy,
23 in response to Mr. Powell's testimony that he expected
24 industry to propose language back to the Division that
25 would help constrain or limit or more effectively

1 target this marginal well financial assurance
2 category, do you have any final recommendations for
3 the Commission on what the guidance might be for how
4 to better limit, constrain?

5 A. Mm-hmm.

6 Q. Besides to totally -- I mean, your
7 preference would be exclude that from that category
8 altogether, right?

9 A. Right, yes. So on the record, I'm not a
10 lawyer, but we do believe the creation of that
11 category is non-compliant with the statute.

12 However, if the Commission decides to
13 adopt it, I agree with Mr. Powell that we need to work
14 on the language to be a little more narrow.

15 There are a couple suggestions that have
16 come up in testimony throughout the week. The one is
17 to increase the threshold for marginal wells within a
18 portfolio from 15 percent to 30. I've heard that, I
19 think that's appropriate.

20 I think if there's a way not to include
21 active wells that are non-marginal as part of that
22 bonding requirement, I think that's appropriate. This
23 is, again, the provision that says that if you're a
24 marginal operator, you need to include all your
25 marginal and your actives as part of the bonding. I

1 think that's not appropriate.

2 So if we were to remove the actives out
3 and keep it to the marginal wells exclusively at
4 30 percent, that could help. I think raising -- or
5 lowering the BOE definition of marginal wells has come
6 up, from 1,000 to 750. That would be appropriate; it
7 drops the effect from 2.3 percent of the state's
8 production to .6 percent. Hopefully I got that right.

9 And then there was one more that I had.
10 Maybe that was it. There were three. I got them.

11 Q. Just to kind of touch on the effect of
12 reducing the threshold, the production threshold in
13 the marginal category, so for some of the Oxy's
14 entities, I think maybe Oxy, USA, it's got so many
15 wells. Even though it has many marginal wells, it may
16 not hit that threshold for the marginal operator
17 category, right?

18 A. Correct.

19 Q. But nevertheless, it has a lot of marginal
20 wells, and having to pay -- I think it's got -- is it
21 several hundred marginal wells? Is that right?

22 A. Correct.

23 Q. And so that would be a substantial financial
24 burden on Oxy, to have to pay the one-well financial
25 assurance for those wells, even though it doesn't kick

1 into the marginal operator status, right?

2 A. Correct.

3 Q. So by reducing it to 750, tell us if that --
4 you know, explain to us why that would be important
5 for an operator like Oxy?

6 A. Well, what I -- and to be fair, I did not
7 run the analysis on dropping from 1,000 to 750, how
8 many wells that would drop for us. But it would
9 definitely drop wells. And so it would mean that the
10 bonding is less.

11 And, again, if the intent is to target
12 risky wells and risky operators, and we can say that
13 Oxy is not a risky operator, and a lot of those wells
14 are not risky, I think that that would be more
15 appropriate.

16 Q. I think that covers everything. Anything
17 else that you wanted to add before I make you
18 available for cross? I think we covered everything,
19 but if not, I want to make sure you have the
20 opportunity to say it.

21 A. No. Thank you everybody and thanks for the
22 hard work and for the discussions. Hopefully we land
23 on an appropriate and good rule.

24 MR. RANKIN: Thank you, Ms. Wallace.

25 Madam Hearing Officer, at this moment, I

1 have no further questions for Ms. Wallace and make
2 her available for cross-examination.

3 HEARING OFFICER ORTH: Thank you very much,
4 Mr. Rankin and Ms. Wallace.

5 Ms. Fox or Ms. O'Grady, do you have
6 questions of Ms. Wallace?

7 MS. O'GRADY: We do. Thank you.

8 CROSS-EXAMINATION

9 BY MS. O'GRADY:

10 Q. Good afternoon. I'm Morgan O'Grady. I'm an
11 attorney for the applicants with the Western
12 Environmental Law Center. Thank you so much,
13 Ms. Wallace, for your time.

14 First, I'd like to thank you for your
15 willingness to meet with applicants in the OCD and
16 negotiate the proposed amendments. We really
17 appreciate Oxy coming to the table and we're glad we
18 could reach agreement on certain provisions.

19 I'd like to start with financial
20 assurance for inactive and approved and expired TA
21 wells. And I'd like to share my screen. Sorry, just
22 adjusting so that it's fully visible. I think that
23 should do it.

24 Preliminarily, Oxy does not propose any
25 modification to applicants proposed definition for the

1 terms "expired temporary abandonment" and "expired
2 temporarily abandoned status," I think that should be.
3 Correct?

4 A. Correct.

5 Q. What is that definition?

6 A. Can you read it.

7 Q. Oh, sure.

8 A. Thank you so much.

9 Q. Sure. "Expired temporary abandonment or
10 expired temporary abandonment status means the status
11 of a well that is inactive and has been approved for
12 temporary abandonment status in accordance with a
13 19.15.25.13 NMAC, but that no longer complies with
14 19.15.25.12 NMAC through 19.15.25.14 NMAC."

15 Turning to 19.15.8.9E NMAC, this
16 provision sets forth applicant's proposed amendments
17 for the financial assurance requirements for inactive
18 wells and wells in approved and expired TA, correct?

19 A. Yes.

20 Q. And on the screen are Oxy's proposed
21 modifications, right?

22 A. I think so, yes.

23 Q. And Oxy's proposed deletions are highlighted
24 in green?

25 A. Yes.

1 Q. And Oxy proposes to retain certain language
2 that applicants proposed to delete. Those
3 modifications are highlighted in blue, right?

4 A. Yes.

5 Q. Oxy proposes to remove the words "and
6 expired" from the title of the section, remove the
7 phrase "in approved and expired temporarily abandoned
8 status," and retain language from the existing rule
9 covered by Subsection A of 19.15.8.9 NMAC that have
10 been in temporarily abandoned status for more than two
11 years, correct?

12 A. Yes.

13 Q. So one effect of Oxy's proposed modification
14 is to remove wells in expired temporary abandonment
15 status from being required to post one-well financial
16 assurance of \$150,000, correct?

17 A. Correct. I'm trying to think if they're
18 covered elsewhere, but I believe yes.

19 Q. Okay?

20 A. I believe you're correct.

21 Q. What is the basis of this proposal?

22 A. I think -- again, I'm trying to make sure
23 that those are not covered elsewhere. I still keep
24 saying we need a flow chart for this. But I think
25 that it is because if they are in expired status, they

1 are either not combined at that time or need to be
2 going through the process for additional approval from
3 the Division, depending on where we go with this rule.

4 And so we thought that they would be
5 either non-compliant and working with the Division on
6 that, or going through the next process around
7 obtaining extension.

8 Q. You would agree that expired TA status is a
9 new status defined in the rules, though, and Oxy
10 didn't propose to amend that definition?

11 A. No, we didn't. It just already has a
12 process in place to handle expired.

13 Q. Okay. You testified that your understanding
14 is that for the first two years, a temporarily
15 abandoned well can remain under the active well
16 blanket bond, correct?

17 A. Yes.

18 Q. And because they've just been approved by
19 the Division, there's no need to put up single-well
20 bonding of 150,000?

21 A. Correct.

22 Q. And you testified that the statute expressly
23 provides for these wells to remain under the blanket
24 bond for two years. Yes. The existing rule applies
25 to wells for which an operator is seeking temporary

1 abandonment, correct?

2 A. The existing rule, yes.

3 Q. All right. Give me just a moment while I
4 pull up those rules.

5 A. I'm not going to have to do the rainbow
6 slide. Luckily, no rainbows.

7 Q. So on the screen are the current rules. I
8 see they're very small. Let me attempt to make them
9 larger. Still a little illegible. I think that's as
10 large as I can make them right now.

11 A. That's good.

12 Q. Okay. Thank you. So the existing rule
13 requires higher bonds when a well enters TA status; is
14 that correct, under the current rules on the screen?

15 A. Or more than two years, is what that says.

16 Q. Can you read the highlighted language on the
17 screen?

18 A. Sure. "An operator shall provide financial
19 assurance for wells that are covered by Subsection A
20 of 19.15.8.9 NMAC that have been in temporarily
21 abandoned status for more than two years or for which
22 the operator is seeking approved temporary
23 abandonment."

24 Q. So wells for which an operator is seeking
25 temporarily abandoned status require that higher FA?

1 A. Say that again. I'm sorry.

2 Q. Wells for which an operator is seeking
3 temporarily abandoned status or seeking approved
4 temporary abandonment require that higher FA under the
5 current inactive wells section.

6 A. Yes.

7 Q. Okay. Thank you. And I'm going to pull up
8 the statute. So this is the 70-2-14 NMSA. Can you
9 read the highlighted sections?

10 A. The first one says, "A blanket plugging
11 financial assurance for temporary abandoned status
12 wells which shall be set by rule in amounts greater
13 than \$50,000."

14 Q. Great. Thank you. And the second section.

15 A. The Oil Conservation Division shall require
16 a one-well financial assurance on any well that has
17 been held in temporarily abandoned status for more
18 than ten years.

19 Q. Two years.

20 A. Sorry. Two years. Oh, my goodness. The
21 two years. Correction.

22 Q. The statute does not explicitly specify
23 which wells are subject to the \$250,000 cap, correct?

24 MR. RANKIN: Objection. Vague question. I
25 think maybe Ms. O'Grady meant to say \$50,000 cap.

1 MS. O'GRADY: Thank you. Yeah, I
2 understand.

3 BY MS. O'GRADY:

4 Q. I'll read a section. So the statute says,
5 above the first highlighted section, that one of the
6 categories that shall be set in rule in an amount not
7 to exceed \$250,000. That's a blanket plugging
8 financial assurances; is that correct?

9 A. Right. And so the way I define it -- well,
10 the way I think I define it, I'm not a lawyer, is it
11 has to be more than \$50,000, but can't be greater than
12 \$250,000.

13 Q. Does the section discussing the blanket
14 plugging financial assurance for \$250,000 specify
15 which wells are eligible for that \$250,000 cap?

16 A. It's in that section. It says "temporarily
17 abandoned status wells," in the yellow section.

18 Q. In the yellow section, yeah. So the 50,000
19 specifies temporarily abandoned status, but the
20 250,000 doesn't specify a status?

21 A. No. I think that's specified elsewhere now.

22 Q. Jumping back briefly to the expired
23 temporary abandonment status and the financial
24 assurance that's required, can you point where in the
25 rules expired TA wells are covered for financial

1 assurance? If not, in the section where Oxy's
2 proposed revision strikes through "expired"?

3 A. No, I don't think that I -- ask that again,
4 because you're talking about the two slides prior,
5 right.

6 Q. Yes. Apologies for jumping back.

7 A. No, it's okay. A lot of words.

8 Q. So here I have up on the screen the section
9 we were just discussing. For this section, Oxy struck
10 through "and expired," and you stated that you
11 believed expired TA wells were covered elsewhere.

12 Can you identify where else in the rules
13 expired TA wells are covered for purposes of financial
14 assurance?

15 A. Right. Okay. So it's not explicitly
16 stated. But in my mind, there's a process for
17 handling those, and they were covered prior under the
18 \$50,000 up to the \$250,000, is how I read that. Your
19 last one.

20 Q. Okay. Give me just a moment.

21 A. And it doesn't say "expired." I'm just
22 taking that forward.

23 Q. Did the prior version of the rules define
24 expired TA wells?

25 A. No.

1 Q. Okay. Thank you. I'd like to turn to the
2 CPI adjustment provision. Are you familiar with the
3 rebuttal testimony of applicant's witness Mr. Peter
4 Morgan?

5 A. Yes. But you're probably going to have to
6 remind me.

7 Q. No problem. Can do. I'm pulling up his
8 rebuttal testimony.

9 A. Only Purvis' charts stay in my mind, burned
10 forever.

11 Q. Understandable. So this is his rebuttal
12 testimony at Bates stamped 1161 to 62. Can you read
13 this section aloud, and I'll try to make it larger for
14 you.

15 A. No, I can see it. "The \$250,000 cap on the
16 amount of blanket financial assurance for active wells
17 is not relevant to the proposed amendment 19.15.8.9.G
18 NMAC allowing for adjustments to financial assurance
19 amounts because the proposed language expressly
20 excludes blanket financial assurances for active
21 wells. The blanket financial assurance amounts for
22 active wells is set at 19.15.8.9C(2) NMAC. The
23 subsection is excluded from the list of financial
24 assurance categories, subject to the adjustments
25 provided under 19.15.8.9G NMAC. That provision

1 applies only to financial assurance announced provided
2 by subsection C(1), D, E and F of this section."

3 Q. Would you agree that applicants proposed
4 rule language excludes the 250,000 active well cap
5 from inflationary adjustments?

6 A. Can you point to that language where it says
7 that.

8 Q. Yeah. So in the testimony that you read, he
9 says the blanket financial assurance amount for active
10 wells is set at 19.15.8.9C(2).

11 A. But I mean, is that language explicitly in
12 C(2)? I'm sorry. That's what I'm looking for.

13 Q. I will pull up C(2) on the screen for you.

14 A. I was looking to see if I had C(2).

15 Q. Sorry for all this bouncing around.

16 A. No, no, it's okay. Lots of words.

17 Q. On the screen are the proposed rules and
18 applicant's Exhibit 1-C. This is the applicant's
19 Exhibit 1, but I don't think it's different from
20 applicant's Exhibit 72 for the purposes of this
21 provision.

22 Can you read 19.15.8.9C? Oh, C(2).
23 Okay. There you go:

24 A. "A blanket plugging financial assurance in
25 the amount of \$250,000 covering all the wells of the

1 operator subject to Section C of 19.15.8.9 NMAC."

2 Q. So would you agree that C(2) covers the
3 active well \$250,000 cap?

4 A. Yes.

5 Q. Okay. So you would agree that the way the
6 applicants drafted the inflationary adjustment
7 provision, it does exclude the \$250,000 cap from
8 adjustments?

9 A. Yes.

10 Q. Turning to approved temporary abandonment
11 renewal, or 25 specifically, Oxy proposes
12 modifications to applicants proposed 19.15.25.13
13 governing the approved temporary abandonment
14 provisions, correct?

15 A. Yes.

16 Q. I'm going to bring up Oxy's proposed
17 modifications. Again, the green highlight represents
18 Oxy's proposed modifications?

19 A. Yes.

20 Q. And the blue text highlighted in green
21 represents new language added by Oxy?

22 A. That's correct.

23 Q. In this section, applicants propose an
24 operator may apply to place a well in approved TA for
25 up to five years upon a demonstration that the well

1 has future beneficial use, correct?

2 A. Yes.

3 Q. And they propose that TA status may be
4 renewed once for up to two years upon a similar
5 showing after a public hearing before OCD?

6 A. Yes.

7 Q. Now, I won't go over each and every
8 modification Oxy proposes here, but I want to focus on
9 Oxy's proposed deletion in subsection B of the last
10 sentence, which provides an extended term shall not
11 exceed two additional years, upon which time the
12 operator shall return the well to beneficial use under
13 a plan the Division approves or permanently plug and
14 abandon the well and restore and remediate the
15 location. Do you see that?

16 A. I do. Can you put your cursor on it?
17 There you go. Got it.

18 Q. Okay. And the intent here of Oxy is to
19 remove any time limit on the second renewal of TA
20 status?

21 A. Yes.

22 Q. Under Oxy's proposal, OCD could approve a
23 second renewal for 5, 10, 15 years?

24 A. It could.

25 Q. And there's no limit and no requirement that

1 OCD periodically review a well's TA status?

2 A. Actually, hold on. Let me back up a second.
3 Because the first sentence that you read, I would
4 argue, can they approve at their discretion up to any
5 years, or are they limited to five years, five-year
6 increments? Do you see what I'm saying.

7 Q. I do. I do. I can ask some questions to
8 get it there.

9 A. Okay.

10 Q. So the language from applicants --

11 A. Mm-hmm.

12 Q. -- that's crossed out, early on in Section
13 B, there's a section that says prior to the expiration
14 of an approved temporary abandonment, the operator
15 shall. It provides various options, including apply
16 for a new approval to temporarily abandon the well to
17 extend temporary abandonment status pursuant to. Is
18 that correct?

19 A. Yes.

20 Q. And the new approval language is in black.
21 So that's in the current existing form of the rule,
22 correct?

23 A. Okay. I follow.

24 Q. Okay. And the amendments by -- or the
25 revisions, those revisions by Oxy to applicants

1 proposed language strike through new approval,
2 correct?

3 A. Correct.

4 Q. Would you like to expand on that answer?

5 A. Well, just to be clear, in this section, our
6 edits are really about not objecting to the Division
7 reviewing it or approving. It's more about stopping
8 the allowance of when you can continue to seek their
9 approval.

10 Q. Would you agree that -- and I've highlighted
11 the word "extend" here. That's my edit to Oxy's
12 language. Would you agree that the current version of
13 the rule requires the application for a new approval,
14 and Oxy's amendments allow for the application for an
15 extension?

16 A. Yes.

17 Q. Would an extension bump an operator back to
18 Subsection A and the processes there?

19 A. Yes. I think so.

20 Q. Would you agree it's maybe a little less
21 clear if the language is being changed from new
22 approval to extension?

23 A. I do. I do. But I think the language could
24 easily be modified to allow that and just make that
25 clear.

1 Q. Okay. To require that the -- that a new
2 approval be requested, at which point OCD could
3 determine how many years are appropriate for that
4 subsequent TA period?

5 A. That's correct.

6 Q. Ms. Wallace, are you familiar with
7 applicant's proposal that would allow a well to be
8 inactive for one year before being placed in TA, an
9 initial placement in TA for up to five years upon a
10 showing to OCD future beneficial use, and a second
11 placement in TA for up to two years upon a showing to
12 OCD in a public hearing, and then after those eight
13 years of inactivity, the well must be plugged or put
14 back into beneficial use?

15 A. I think I'm aware of it. I swear we need a
16 flow chart.

17 Q. Definitely, I agree. Are you familiar with
18 Mr. -- and I think you did reference this in your
19 testimony. You're familiar with Mr. Alexander's
20 rebuttal testimony about various factors that could be
21 applied.

22 A. Yes.

23 Q. I'm going to put those up on the screen. I
24 just wrote out what he testified to.

25 So to summarize and to refresh the

1 Commission, Mr. Alexander set forth a number of
2 principles for any such exception, including that they
3 must be limited in scope; limited in time; subject to
4 periodic OCD review; based on sound engineering,
5 technical, economic and administrative information;
6 not subject or not based on guesswork, hunches and
7 speculation or the like; and carefully crafted to
8 avoid any kind of loophole leading to abuse. Correct?

9 A. Yes, I'm familiar.

10 Q. In your opinion, are those reasonable
11 principles upon which to base an exception to the
12 eight-year limitation on a well remaining in TA
13 status?

14 A. Mostly. So it's everything that we're doing
15 now. I think number 5 is a little subjective, right?
16 I don't know how you prove that someone's guessing
17 unless they come in and say, "Hey, I'm guessing at
18 this and I want 500 wells involved," which I don't
19 think anyone is going to do.

20 So I think other than 5 being
21 subjective, the rest of it is everything that we're
22 doing now.

23 Q. Does Oxy have any proposals for how to --
24 strike that. All right. I'll move to my last set of
25 questions.

1 Applicant's proposed rules do not
2 require the plugging of marginal wells, correct?

3 A. No, not explicitly.

4 Q. Applicants proposed rules require heightened
5 financial assurance for marginal wells?

6 A. That is correct.

7 Q. And wells may come out of marginal status if
8 they're reworked or otherwise improved to improve
9 production?

10 A. Yes.

11 MS. O'GRADY: I have no further questions.
12 Thank you for your testimony, Ms. Wallace.

13 HEARING OFFICER ORTH: Thank you,
14 Ms. O'Grady.

15 Mr. Tremaine, do you have questions of
16 Ms. Wallace?

17 MR. TREMAINE: I do have questions for
18 Ms. Wallace.

19 HEARING OFFICER ORTH: You know what,
20 though? I'm realizing it's time for a break. Is
21 that okay?

22 MR. TREMAINE: That's quite all right. I
23 actually have more questions for Ms. Wallace than I
24 intended. So give me 15, 20 minutes.

25 HEARING OFFICER ORTH: Terrific. Let's take

1 15 minutes, come back at ten of 11:00.

2 (Recess held from 10:34 to 10:50 a.m.)

3 HEARING OFFICER ORTH: We are back after a
4 short break. Mr. Rankin, is there anything you'd
5 like to say before we go to Mr. Tremaine?

6 MR. RANKIN: Thank you, Madam Hearing
7 Officer. Just one housekeeping matter. I have not
8 moved the admission of Oxy's exhibit. I could wait
9 to do it. Well, let me just go ahead and do it now.

10 I'd like to move the admission of Oxy's
11 Exhibits A and B into the record, A being Oxy's
12 proposed modifications to the proposed rule, and the
13 B being Ms. Tiffany Wallace's direct testimony. And
14 I'd like to also move into the admission Ms. Tiffany
15 Wallace's rebuttal statement and exhibits as well,
16 which I think are marked as Exhibit B, rebuttal.

17 HEARING OFFICER ORTH: Thank you. I'll
18 pause for a moment in the event there are objections.

19 Okay. The exhibits are admitted. Thank
20 you.

21 (Admitted: Oxy USA Exhibits A and B.)

22 HEARING OFFICER ORTH: Mr. Tremaine, you
23 said you have questions for Ms. Wallace?

24 MR. TREMAINE: I do. I do.

25 CROSS-EXAMINATION

1 BY MR. TREMAINE:

2 Q. Good morning, Ms. Wallace. Welcome back to
3 OCC Hearings. It's good to see you. I hope you've
4 been well.

5 A. Good to see you, too.

6 Q. So just a clarification on timing. When did
7 Oxy come to the table to discuss with petitioners and
8 OCD thoughts about the revised petition?

9 A. When did we first meet? Oh, I think we
10 started last summer, where there was an initial
11 meeting. And then we met with -- there was an initial
12 meeting with WELC. And then I think all of our
13 meetings after that were with WELC and the Division.

14 Q. Would you agree that we've made quite a bit
15 of progress in a relatively short period of time in
16 reaching consensus on certain parts of the rule?

17 A. Yes.

18 Q. Thank you. I want to ask you a little bit
19 about operator transactions. Is it normal business
20 practice for oil and gas operators to buy or sell
21 wells and/or facilities?

22 A. Yes.

23 Q. Do you agree that Oxy's various subdivisions
24 have bought or sold wells and/or facilities numerous
25 times throughout their operational history?

1 A. Yes.

2 Q. To the best of your knowledge, does Oxy
3 perform any kind of analysis or risk assessment when
4 buying or selling either wells or facilities?

5 A. Yes.

6 Q. If you're buying a well or facility, you
7 probably want to know if there's any compliance or
8 operational wells there, correct?

9 A. Yes.

10 Q. If you're selling, does Oxy look at the
11 buyer to see if they're going to keep up with their
12 end of the bargain?

13 A. Yes.

14 Q. I want to ask you kind of a hypothetical.
15 And I'm not talking about -- for the record, I'm not
16 talking about an Oxy transaction, but just generally
17 speaking.

18 So a predicate question. Does Oxy have
19 wells -- I believe you said yes already, but does Oxy
20 have wells that would fall into the currently proposed
21 definition of marginal using "and"?

22 A. Yes.

23 Q. Okay. Let's say, hypothetically, that Oxy
24 wanted to sell 600 of those wells to another operator.
25 In that fact pattern, as a prudent operator, what kind

1 of business and liability concerns might you have on
2 Oxy then with that transaction, selling 600 marginal
3 wells to another operator?

4 A. Okay. So I want to be clear that I don't
5 work in this division at Oxy, so I'm speaking
6 generally about what I know in industry, which I can't
7 imagine Oxy isn't similar.

8 I think there's some legal concerns, and
9 not a lawyer, surrounding if the wells were passed on
10 to an operator that left them the next year, would the
11 turnaround liability end up on Oxy, as a hypothetical
12 example like you're talking. And again, not a lawyer.

13 Q. Understood. If that happened, would you
14 have any, like -- would that impact your operations
15 and your bottom line potentially? Now you went off.

16 A. Now I went off. Okay.

17 Q. When you just articulated with the concern,
18 you know, if you sell a bunch of marginal wells to
19 another operator and then they just cease operations,
20 the concern is that some of that liability could come
21 back on Oxy, correct?

22 A. It could. And that's also our reputation.
23 We're not that type of operator.

24 Q. So as a prudent operator, do you do any kind
25 of due diligence review of the buyer?

1 A. I would imagine so, but I don't know what
2 that looks like, because I haven't done that part of
3 the business with Oxy. But I would imagine so.

4 Q. Thank you for that clarification. And I
5 don't want you to speak for other divisions.

6 In your prior life, have you performed
7 any version of that kind of analysis?

8 A. Yes.

9 Q. And from the operation standpoint, looking
10 at such a transaction, what would you call that type
11 of analysis?

12 A. Due diligence.

13 Q. Due diligence analysis. Okay. Is a due
14 diligence analysis related to oil and gas well and
15 facility transactions, in your professional opinion, a
16 prudent business practice?

17 A. Yes.

18 Q. Is it a necessary business practice?

19 A. I suppose that depends on who you are. I
20 think yes. And anyone I want to work with, yes. But
21 I think it depends on the company.

22 Q. Is it, in your understanding, currently
23 prescribed or required by rule to engage in a due
24 diligence analysis with transactions?

25 A. No, not that I know of.

1 Q. All right. Broader question. In your
2 experience and professional opinion, how widespread of
3 a practice is a due diligence analysis for oil and gas
4 well and facility transactions in the industry at
5 large?

6 A. Oh, I think it's pretty widespread.

7 Q. Okay. Thank you for that. I'm going to
8 move on to some of your other testimony here.

9 I asked you about qualifying marginal
10 wells. But as well as, is it safe to assume that Oxy
11 would have some number of wells that produced less
12 than 90 BOE and less than 90 days in fiscal year 2024?

13 A. Yes. I'm guessing, but probably.

14 Q. As a general matter, wells that follow into
15 that category within Oxy's portfolio, do those wells
16 have downhole mechanical issues?

17 A. Sometimes.

18 Q. Is there any specific reason why such a well
19 cannot produce at least 180 days in a given year?

20 A. Oh, there could probably be a host of
21 reasons. And again, I'm not -- I don't have any
22 specifics to talk to to Oxy, so I'll speak just
23 broader experience.

24 There can be downhole issues and we're
25 waiting to get a rig out there. There could be --

1 maybe we're waiting on purpose because we want to get
2 out there and do a refrac and not just fix the
3 mechanical issues, but also chase some additional
4 reserves.

5 And so we're waiting on purpose for the
6 right rig or the right capital or insertion into the
7 development plan. There's a host of reasons. It
8 might be economics, well price -- oil price. Sorry.

9 Q. Okay. Thank you.

10 MR. TREMAINE: Madam Hearing Officer, I'd
11 like to share my screen. Looks like I still have
12 permission.

13 BY MR. TREMAINE:

14 Q. All right. So, Ms. Wallace, you referenced
15 several wells in your testimony, I believe it was your
16 rebuttal testimony. The first being the, what I'm
17 going to call the Harroun 9 Number 1.

18 A. Mm-hmm.

19 Q. I think you can see here this is Oxy. We're
20 talking about the same well, correct?

21 A. Correct.

22 Q. Okay. Would you agree that after reviewing
23 the well file here, it's apparent that Oxy ran what
24 I'm going to refer to as a casing patch in this well.
25 That's not on screen. I'm not --

1 A. Yeah, I was like -- yeah, okay.

2 Q. Would you have any reason to disagree that
3 Oxy took a corrective action that we'll refer to as a
4 casing patch on that well?

5 A. I would have no reason to believe otherwise.
6 I mean, if you tell me.

7 Q. If that if that was the case, would that
8 mean there was some form of defect in the well's
9 casing?

10 A. Potentially.

11 Q. In the event that there is a defect in a
12 well's casing, would you agree that OCD rule currently
13 requires operators to fix such casing defects?

14 A. Yes.

15 Q. Okay. So with the assumption that that's
16 what happened here, if you can assume that, would you
17 agree that because Oxy took a required action to
18 correct the casing defect, that the end result is that
19 this would no longer fall into a marginal status as
20 defined by the current petition?

21 A. If that is the way that it happened, then
22 yes. But I don't have the specific knowledge Of how
23 that went down.

24 Q. I understand. Thank you. If you have a
25 well that -- so I'll refer you to -- let's go scroll

1 down to production, and we can see -- what I'm sharing
2 on screen is, and I believe, Ms. Wallace, you're well
3 familiar with us from permitting from your time here.
4 So I've just clicked on the right on production
5 values. And this shows production by year.

6 And so if we scroll down to more recent
7 Recent years on this well, we can see a pretty
8 significant bump in 2022. So we had a down year in
9 2019 and 2020, and then you get significantly more
10 significantly more production after that. Would you
11 agree?

12 A. Yes.

13 Q. Okay. So, in 2019, there were 223 barrels
14 of oil and 43 days of production; there was less than
15 that in 2020. So at that time if you were looking at
16 that production, would you agree that there would be a
17 concern that this well would fit into the currently
18 proposed marginal well status?

19 A. Yes.

20 Q. Okay. But Oxy did something, which I
21 proposed to you what it is, but you don't know about
22 that, but Oxy did something and you significantly
23 increased the production from this well, correct?

24 A. Yes.

25 Q. Okay. If you increase production to this

1 extent -- I mean, in 2020, we're looking at 18 barrels
2 of oil; in 2021, you're seeing 7,000 barrels of oil.
3 Increased production means increased revenue for Oxy,
4 correct?

5 A. Yes. And the state.

6 Q. And the state. Well, that's my next --
7 you're jumping -- you're getting ahead of me.

8 So increased revenue, increased taxes
9 and increased royalties, right?

10 A. Mm-hmm.

11 Q. I'm trying to avoid the compound questions.
12 But you're right with me.

13 So if Oxy did not perform whatever work
14 that they did in 2020 or 2021, this well would have
15 significantly under-produced its capability. Would
16 you agree with that?

17 A. Yes.

18 Q. Okay. And since this well is producible and
19 you were able to work over the well and increase the
20 production, leaving that production on the table, the
21 alternative that I described, you could argue that
22 that would constitute waste, could you not?

23 A. Yes.

24 Q. Okay. You said you didn't know what Oxy did
25 on this well. But can you articulate, from your

1 operational experience, generally, if you have to
2 perform a casing patch on a well, what kind of range
3 of cost? How much did that cost Oxy?

4 A. Oh, boy. Oh, I couldn't tell you. I
5 especially couldn't tell you now. But I'll tell you,
6 it's less than a new drill.

7 And was this also -- did I see it's a
8 vertical well? Did I see that in the prior --

9 Q. Do you want me to scroll to the top?

10 A. The very first --

11 Q. You're going to be more versed in describing
12 that than I am.

13 A. Well, we'll see.

14 Q. Vertical.

15 A. Okay. So it's a vertical well. And I'm
16 just keeping that in the back of my mind, because
17 those are sometimes handled differently, they're
18 older, right, than horizontal for sure.

19 I could not quote you quotes right now
20 on that. What I'd tell you is it's less than a new
21 drill, unless we run into large problems.

22 Q. What kind of problems can you run into?

23 A. All the ones that the Division described
24 when it gave its nasty examples, right? When you're
25 going into a well, it's like -- especially older

1 wells, it's like working on an old car, you go in to
2 fix one thing and five other things are wrong.

3 Sometimes that happens. You can't
4 predict when that's going to happen. So I would tell
5 you it's less than a new drill unless there are
6 problems.

7 Q. Would you characterize the expense as
8 significant? I'll strike that. I think you've
9 answered the question. I'll move on.

10 All right. I want to ask you about your
11 next example, which is the FNR 35 Federal Number 3H.
12 Do you agree that this is the same well in your
13 example?

14 A. I believe so, yes.

15 Q. Okay. I'm going to, again -- I love the
16 production tab here. So we're going to go down here
17 and we're going to look at 2021. You had 10,000
18 barrels of oil; 2022, zilch; 2023, again zilch.

19 A. Mm-hmm.

20 Q. And then you saw a return to more
21 production, but not back to its previous levels in
22 2024. Would you generally agree with that or qualify
23 that characterization at all?

24 A. Yes.

25 Q. Okay. So looking at the production history

1 alone on this well, would you agree that it's accurate
2 to state that it took Oxy a couple years to address
3 the downhole problem on this well?

4 A. Yes.

5 Q. Okay. Do you happen to know whether Oxy
6 reported any of that downhole work to OCD?

7 A. I do not know.

8 Q. Okay. I would just submit if the answer is
9 ultimately no, you might want to look into that.

10 A. Okay.

11 Q. Would you agree that -- would you agree or
12 understand that OCD looking at this production history
13 would be concerned that there might be a downhole
14 problem probably in the 2021 to 2022 range?

15 A. Maybe. Without looking at all the
16 production in the wells in the area, I -- I can --
17 would assume that our operations people would look at
18 that, I know. But I can also say that there can be
19 things going around on, like, did we shut it in for
20 completions next door, did we then have a problem
21 getting it back once it was shut in.

22 There are a host of reasons why wells go
23 down, and I could not say without being part of that
24 team at this time.

25 Q. Okay. It was the tail end of COVID, too,

1 for some of that.

2 A. I was here then.

3 Q. Right?

4 A. I was with the state.

5 Q. All right. Would you agree that if there is
6 a concern about a potential downhole problem, that if
7 OCD were to look at a well file and see nothing
8 related to downhole problems in the well file, it
9 would be more difficult for OCD to review if they'd
10 require additional information to determine whether
11 the well -- say a presumption of no beneficial use
12 analysis, that would be necessary information for OCD
13 to know? For instance, is Oxy doing a workover?

14 A. Okay. Ask that again.

15 Q. Let me back up. So in 2022, we're looking
16 at zero oil production, 32 MCF of gas, and three days
17 in production?

18 A. Right.

19 Q. We'd agree that in 2022, that would have
20 been a presumption of no beneficial use well?

21 A. Yes. Unless we could prove otherwise.

22 Q. Correct. And that's any gas well.

23 A. We would have had it so that it's shut in on
24 purpose or it has some problem. Right, exactly.

25 Q. So OCD would need to know, when looking at

1 that well, what's going on with it. Is Oxy --

2 A. Yes.

3 Q. -- doing an EOR project, are you going for
4 approved TA, are you doing a work over?

5 A. Yes.

6 Q. Okay. And something happened with this well
7 where in 2024, it returned to a level of production
8 where you have 1,975 barrels of oil produced in 2024.
9 Do you agree with that?

10 A. Okay.

11 Q. Would you agree that using the 1,000 BOE
12 and 180-day calculus, that as of 2024, this well would
13 no longer fall into a marginal well category?

14 A. Correct.

15 Q. Okay. Thank you. Do you agree,
16 particularly from your experience, that while working
17 at the Division, that even prudent operators can miss
18 necessary filings?

19 A. Yes.

20 Q. Incomplete well files, increase OCD burden,
21 administrative burden in the event that any kind of
22 analysis or well review is required, correct?

23 A. Yes. I'd say it's probably getting better
24 now that we've gone digital. I hope.

25 Q. Very much agreed. A little bit before my

1 time that there's some vestiges there.

2 Would you agree that in some cases where
3 OCD is looking at well status, in certain specific
4 instances, more general proxies for well statuses or
5 criteria may be necessary rather than requiring OCD to
6 do deep dives into well files?

7 A. I'm not sure I understand what you mean by
8 that.

9 Q. So I asked you just a second ago about, you
10 know, an increased burden if OCD is operating with a
11 delta of information and they have to look at a well
12 and they don't have all the information available, the
13 analysis and information is -- that makes the analysis
14 for us to be more somewhat more difficult.

15 A. Yes.

16 Q. Okay. So would you agree that, where
17 appropriate, it is helpful to create more simplistic
18 categories of well statuses or criteria, rather than
19 requiring well-by-well deep dives into status and well
20 history? Just at a general level?

21 A. Yes. You mean like marginal.

22 Q. Well, that's what I'm implying. The rule --

23 A. I would say yes, but I would say so long as
24 the -- if the lumping into named categories is for the
25 Division's benefit to categorize and ask for

1 additional information and analyze, that's a very
2 different story than also now putting a financial
3 burden upon those wells.

4 Q. Agree. And we can agree that those are two
5 different questions, right?

6 A. Yes.

7 Q. There's the question of how does OCD
8 determine at least a threshold matter that a well fits
9 a particular category, and then there's the question
10 of what do you do based on that information; would you
11 agree?

12 A. Well, correct. And even like you were
13 discussing if OCD wanted to call a set of wells a
14 certain category, you call them blue, for all I care,
15 in order to talk about them better within their
16 Division and in order to, let's say, write guidance
17 for what they need to be able to do their analysis for
18 those wells, it's just ease of use, ease of
19 discussion.

20 That is a very different thing than
21 creating a category that has a burden of some sorts,
22 like a financial burden.

23 Q. And did I understand that -- I mean, from
24 your testimony, Oxy agrees with the presumption of no
25 beneficial use, right?

1 A. Yes.

2 Q. Would a structure that allows operators to
3 respond to marginal well status after a determination,
4 would that alleviate any of Oxy's concerns?

5 A. Maybe. Are you talking in terms of, "Oxy,
6 is this well marginal or not?" You know, you're
7 looking at data. "Oxy, why is this" -- you know, are
8 you talking like that? "Why is this well marginal?
9 What are you going to do about it."

10 Q. Sort of. I'm not making a specific proffer.
11 I'm just kind of examining, like, what the common
12 ground is here.

13 So Oxy agrees with the presumption --

14 A. Yes --

15 Q. -- structure --

16 A. Yeah, we do.

17 Q. -- or --

18 A. We do. We think that's a great way of
19 trying to target what I think your intent is.

20 Q. If there was a similar presumption structure
21 for marginal wells that both alleviated administrative
22 burden on OCD but allowed operators to respond
23 specifically to marginal well status, would that
24 alleviate Oxy's concerns with the marginal well
25 category and the FA?

1 A. I don't know. So there's a legal aspect to
2 that that I can't probably comment further than I
3 already have because I'm not a lawyer. And I think
4 the other aspect to that is, even if there was like a
5 provision where you could explain the marginal,
6 there's still impacts to production and operators
7 within the state. Unless I'm misunderstanding you.

8 Q. No, I don't think -- I don't think we're
9 going to hammer out a new provision on the stand. I'm
10 just trying to examine the contours here.

11 A. So that's good, because I feel a lot of
12 pressure.

13 Q. Tell us what language you want.

14 No, I want to move on to your third
15 example, which is the Cedar Canyon 15 Number 2h. Can
16 we agree this is the well that you referenced?

17 A. I believe -- I believe you.

18 Q. Okay. And once again, I'm going to click on
19 my favorite thing.

20 A. For the Commission, it was called CC15 2H in
21 my slides. So it might look different.

22 Q. Yes, actually that caused me a little bit
23 of trouble finding it.

24 So Cedar Canyon here. But looking at
25 this well, I'm going to click back on production and

1 I'm going to look at these recent years. So just
2 looking at 2020 to 2025, this production, can we agree
3 that this example well never would have fallen in that
4 time period into either the proposed marginal well or
5 the presumption of no beneficial use well categories?

6 A. No, you're right, if this is the same well.
7 Again, my name is different. I can only assume it's
8 this one. I don't know. But you're right, it would
9 not have fallen into marginal.

10 Q. Okay. I want to ask you questions about a
11 different well, that was not one of your examples.
12 And so I'm going to pull up what we'll refer to as the
13 Bradley 13 Federal Number 4Q.

14 When you look at this page in OCD
15 permitting, do you agree that this is a well
16 registered to and operated by Oxy USA, Incorporated?

17 A. Yes.

18 Q. I'm going to go down to, again, sensing a
19 pattern here, production. Let's look at the
20 production values on this well. In particular, look
21 at 2021 through 2024. I would submit that this is
22 showing somewhat of a similar pattern that we've
23 talked about.

24 Looking at this in terms of '24 -- well,
25 FY24, so that isn't really broken down on here. But

1 in looking across the reporting periods for 2023 and
2 2024, would you agree that Oxy reported 1 MCF of gas
3 and a total of 0.166667 barrel of oil equivalent
4 production for that entire fiscal year?

5 A. That's what it looks like.

6 Q. Well, would you be surprised to hear that
7 between Oxy's two OGRIDs, you have six wells with that
8 same production value?

9 A. I don't know.

10 Q. Well, referring back to this particular
11 well, how would you explain production over that long
12 of a period of time where you'd have a single MCF of
13 gas produced?

14 A. I don't -- I don't know. I don't know what
15 was going on at the time with these wells or in the
16 field or...

17 Q. I'll ask a more specific question. We've
18 heard during the testimony, and I think in both of our
19 experiences, we've talked about this constraint
20 takeaway concept, right, for a gas takeaway? Are you
21 familiar with that concept?

22 A. Yes.

23 Q. Okay. And so would you agree that you have
24 to produce at a certain amount of pressure in order to
25 get into a takeaway line of some sort?

1 A. Most of the times, yes.

2 Q. So if over the course of a year, you produce
3 1 MCF of gas, how is it possible that you get that MCF
4 of gas into takeaway for a midstreamer or processing?

5 MR. RANKIN: Madam Hearing Officer, I'm not
6 sure exactly where this is going. It's a little bit
7 outside the scope of her testimony. And also,
8 Ms. Wallace is not in an operational role at Oxy.
9 She does policy. So she is not up to speed
10 necessarily with the details of how the operation
11 aspects of these wells?

12 I don't want to -- you know, I want to
13 just protect her a little bit, because she doesn't
14 know the details of these wells and didn't review
15 them prior the hearing. And it is outside the scope
16 of her testimony.

17 HEARING OFFICER ORTH: All right. She did
18 earlier state clearly that she was not on the
19 operation side, Mr. Tremaine.

20 MR. TREMAINE: I'll move on.

21 HEARING OFFICER ORTH: Thank you.

22 BY MR. TREMAINE:

23 Q. So, Ms. Wallace, looking at the 2025
24 production data, here, again, we're looking at 267
25 barrels of oil in that first column and 203 days

1 produced. So regardless of what happened at the basis
2 of my earlier questions for you, would you agree that
3 as of this year, this well no longer falls into a
4 marginal well status?

5 A. Yes.

6 Q. So I'm going to stop asking you about
7 specific wells. Thank you very much for that.

8 So as we work through those four
9 different examples of wells, all of which I think were
10 proposed as having concerns of falling into marginal
11 well status at one time or another, we found that in
12 each of those examples, they are not currently going
13 to fall into marginal well status. Would you just
14 agree as a summary?

15 A. Yes.

16 Q. So would you agree that we've provided some
17 really good examples of Oxy being able to bring
18 marginal wells out of marginal status through proper
19 maintenance and workovers?

20 A. Yes. Although I believe at least one of
21 those was a refrac, which I wouldn't say is
22 maintenance.

23 Q. That's a different category. That's not
24 maintenance.

25 A. Right. I mean, sometimes the wells improve

1 because of maintenance or workover. And sometimes
2 they improve because we have chased a different piece
3 of the reservoir, I'd say.

4 Q. That's a very important distinction. Thank
5 you for that.

6 So what I'm getting at, the question I'm
7 trying to ask you, inartfully, is that Oxy expended
8 some resources, performed some sort of work on the
9 well, and took these examples from marginal or very,
10 very low, no production status, up to productive well
11 status?

12 A. Yes.

13 Q. And would you agree that to the extent that
14 Oxy has wells that, as of right now, would fall into,
15 quote, unquote, marginal well status as defined, that
16 under the petition, Oxy would have until 2028 to
17 address those marginal well statuses?

18 A. I believe so, yes.

19 Q. Or alternatively, to provide the necessary
20 financial assurance, assuming the rule is enacted as
21 proposed?

22 A. Yes.

23 Q. So Oxy won't have to foot the bill of any
24 kind for additional FA for at least two years? Do you
25 agree?

1 A. Agree, yes.

2 Q. Okay. Thank you. Moving off of wells.

3 All right. So you spoke earlier a
4 little bit about Oxy's substantial plugging efforts.
5 I believe you indicated it was over 100 wells per
6 year?

7 A. About. It was almost 500 wells across the
8 last five years. So 100 a well, it works out to be --
9 or 100 a year.

10 Q. Can we agree that that's a significant
11 expenditure for Oxy?

12 A. Yes.

13 Q. Did Oxy use any of its resources to perform
14 any comprehensive studies looking at impacts of this
15 proposed rule to waste correlative rights production
16 or impacts to OCD plugging costs?

17 A. I would not be aware of that if we did.

18 Q. To your knowledge, has any industry group or
19 independent entity performed such a comprehensive
20 study?

21 A. I wouldn't be able to speak to that.

22 Q. You've been in this industry and operating
23 in New Mexico on kind of both sides of the regulator
24 and operator fence for a while now. How would you
25 characterize the total economic value of the oil and

1 gas industry in New Mexico?

2 A. Significant.

3 Q. Billions?

4 A. Yes.

5 Q. And on an annual basis, would you agree that
6 the value of revenue is in the billions?

7 A. I believe so.

8 Q. During your time at the OCD, what was the
9 Division's total annual operating budget?

10 A. Oh, man. Significantly lower. I'm not
11 going to remember those numbers. It was rough though.

12 Q. Not billions.

13 A. No, not billions.

14 Q. Billions? Okay. What was the total
15 operating budget of Oxy entities for its most recent
16 recording or fiscal year?

17 A. I don't know that either. Maybe I should,
18 but I do not. I'm not on that side of the business.

19 Q. Is it safe to assume this significantly more
20 than OCD's annual operating budget?

21 A. Yes.

22 Q. All right. I'm going to move off of that
23 one now. Thank you. There was some very helpful
24 contours, I hope.

25 So the marginal well definition, I want

1 to break that down with you a little bit. Would you
2 agree that there's -- let me describe this and see if
3 you agree. I would propose to you that there's kind
4 of three different components here.

5 One, there's the proposed definition for
6 a category of marginal wells.

7 A. Mm-hmm.

8 Q. And then there is the use of that category
9 to disqualify, proposed use of that category, to
10 disqualify single marginal wells from eligibility for
11 blanket FA.

12 A. Yes.

13 Q. Okay. And then there is a third, there is
14 the use of the 15 percent threshold for marginal wells
15 to disqualify portfolios of wells from eligibility for
16 blanket financial assurance. Would you agree that
17 those are kind of three separate, but related things?

18 A. Yes.

19 Q. Okay. And just to clarify, my understanding
20 is that Oxy objects to the second and third components
21 of that, the single-well FA for marginal wells and the
22 use of the 15 percent criteria to disqualify
23 portfolios. Those are your objections, correct?

24 A. Yes. I believe we also object to the
25 definition for the basis of the same reasons. You

1 gave three, right, the definition, the use to qualify
2 from blanket and the 15 percent.

3 A. I think all three, for the same reasons, we
4 would object.

5 Q. Well, is the definition of a category of
6 wells within a certain range of production, per se,
7 objectionable independent of the FA considerations?
8 If there's some other hypothetical use for defining
9 marginal wells a particular way for classification
10 purposes, that would not be objectionable, correct?

11 A. It could be based off the thresholds that
12 are there now. Right? So the definition is that --
13 so this is going back to the discussion of if it's
14 defined as 1,000 barrels versus 750, which one is
15 truly a marginal, Or let's call it at-risk well.

16 Q. All right. A couple questions about kind of
17 the landing spot here. I have, I think, two more
18 questions for you, Ms. Wallace.

19 If OCD agreed to move the 15 percent
20 portfolio blanket FA disqualifying threshold to 30
21 percent, could Oxy support the proposed structure?

22 A. Probably not within my singular decision to
23 make. But I would say that that is a more reasonable
24 approach.

25 Q. But that 30 percent cut-off for portfolios

1 is better than 15 percent, in your opinion?

2 A. Yes. Because it harnesses, like I said,
3 more of what I think that your intent is. And there's
4 less impact to the state and of course Oxy.

5 Q. If OCD proposed, similarly, to replace the
6 marginal wells in the 15 percent threshold with a 15
7 percent threshold referring to inactive wells or
8 another potential descriptor of non-compliance, could
9 Oxy support the proposed structure?

10 A. Say that one more time.

11 Q. Yes. So I asked you about changing the 15
12 percent cut-off to 30 percent. Now I'm asking you
13 about -- forget the cut-offs. Let's say you replace a
14 marginal well as the point of concern for a portfolio
15 disqualification, right?

16 A. Right.

17 Q. So we're talking the same structure, but you
18 replace marginal wells with some other descriptor of
19 non-compliance or concern.

20 A. Okay.

21 Q. In that event, could Oxy support the
22 structure of the petition?

23 A. Potentially. I think what we are after here
24 is, again, making sure -- because we're threading the
25 needle of trying to accomplish what you're after, of

1 reducing the potential impact to the state from risky
2 wells. The thread-the-needle part is defining the
3 risky wells properly.

4 So I think the harness is too -- you
5 know, the halo is too wide right now. If that is a
6 reasonable way to capture this better, I think then,
7 yes, we could support it.

8 Q. And again, not a proffer. Examining the
9 contours. I have to talk about it.

10 A. Yeah, I know, I know.

11 Q. So I lied, I have one more question for
12 you. Ms. Wallace, in your professional experience,
13 whether working in industry or working at OCD, have
14 you ever observed an oil and gas operator bankruptcy
15 that surprised you?

16 A. That surprised me is the key there. I think
17 when I have observed that, I was largely unaware of
18 the company to begin with. And so neither surprised
19 nor didn't surprise me. It just was, and it was
20 unfortunate.

21 Q. And so the for your response is that you
22 don't know the company's financials, correct?

23 A. Correct.

24 Q. Would you agree that OCD does not have
25 in-depth knowledge of any specific company's

1 financials unless we were to -- well, I'll stop the
2 question there.

3 Would you agree that as a general
4 matter, OCD does not have in-depth knowledge of any
5 specific oil and gas operator's financial condition?

6 A. That is correct. Unless it's being brought
7 up as part of some ongoing investigation that were to
8 be asked.

9 Q. Right. You were right with me with the
10 second part of my compound question. It's something
11 that we can get if we specifically ask for it, but
12 there has to be a reason --

13 A. Right.

14 Q. -- under the existing rules for us to get
15 that information; would you agree?

16 A. That's correct.

17 MR. TREMAINE: I will pass the witness.
18 Thank you for all of your time, Ms. Wallace.

19 THE WITNESS: Thank you, Jesse.

20 HEARING OFFICER ORTH: Thank you
21 Mr. Tremaine.

22 Mr. Moore, do you have questions of
23 Ms. Wallace? Mr. Moore, I think I see you on the
24 platform. You may have stepped away.

25 MR. MOORE: My apologies, Madam Hearing

1 Examiner. I was distracted for just a moment.

2 CROSS-EXAMINATION

3 BY MR. MOORE:

4 Q. I do have limited questions for you,
5 Ms. Wallace. To begin, hi, good morning. My name is
6 Richard Moore. I represent the commissioner of public
7 lands and the State Land Office in this proceeding.
8 And we thank you for your testimony here today.

9 I just wanted to ask if you were
10 familiar with the recommendation of the witness for
11 the commissioner and State Land Office that the -- and
12 I'll share my screen here -- that the proposed changes
13 to 19.15.9.8C(5), that the Division may deny
14 registration as an operator if the applicant is a
15 corporation, limited liability company or limited
16 partnership and is not registered or in good standing
17 with the New Mexico Secretary of State. Did that list
18 include limited liability, limited partnerships?

19 A. And your question is am I aware of the
20 change.

21 Q. I'm not sure if you have been listening to
22 the testimony so far in this proceeding or if you've
23 seen that written testimony from Ms. Marks.

24 A. I heard Ms. Marks' testimony yesterday, yes.

25 Q. And would you agree that the inclusion of

1 limited liability, limited partnerships would better
2 encompass the company structures included under
3 New Mexico law?

4 A. I don't know that I disagree. I think it's
5 probably more of a legal thing, and I'm not a lawyer.
6 But I don't have any reason to disagree.

7 Q. And I guess just generally, would you agree
8 that it would be better to be more inclusive rather
9 than less inclusive under this section?

10 A. I would agree with that.

11 MR. MOORE: All right. I think those are
12 all the questions that I had. Thank you.

13 HEARING OFFICER ORTH: Thank you, Mr. Moore.
14 Ms. Nanasi, are you with us? No.

15 Mr. Maxwell, do you have questions of
16 Ms. Wallace? You have stepped away.

17 Mr. Sayer, do you have questions of
18 Ms. Wallace? All right. He said no.

19 Mr. Suazo, do you have questions of
20 Ms. Wallace?

21 MR. MAXWELL: Your Honor, this is
22 Mr. Maxwell. Can you hear me?

23 HEARING OFFICER ORTH: Oh, yes. Hello,
24 Mr. Maxwell.

25 MR. MAXWELL: I have no questions. Just had

1 difficulty unmuting. Thank you.

2 HEARING OFFICER ORTH: Thank you.

3 Mr. Suazo.

4 MR. SUAZO: Can I ask that Mr. Cloutier go
5 before NMOGA, and if I have questions thereafter,
6 I'll you know?

7 HEARING OFFICER ORTH: Sure. Mr. Cloutier.

8 CROSS-EXAMINATION

9 BY MR. CLOUTIER:

10 Q. Good morning, Ms. Wallace. My name is Drew
11 Cloutier. I represent IPANM in these proceedings.
12 And we met briefly for the first time yesterday.

13 I want to talk primarily, in general,
14 about the three exemplar workovers refracts that you
15 testified to. Those are common activities in the oil
16 and gas industry, correct? They're not limited to
17 Oxy?

18 A. No. One hundred percent common activities.

19 Q. And in response to Mr. Tremaine's
20 questioning and his showing you gaps in production,
21 when you're looking at older wells, there is a time
22 lag between a drop in production and a decision to do
23 something, correct?

24 A. That's true.

25 Q. You've got to think about what it is, what

1 its effect would be, justify the economics to your
2 manager, all sorts of steps like that, correct?

3 A. That's correct.

4 Q. And I want to try and complete the circle,
5 but first of all, you talked about going in and having
6 other Oxy people help you tell the story with these
7 three examples, correct?

8 A. Yes.

9 Q. Because there's not a database in a company
10 even as big as Oxy that you can push a button and say,
11 this is what we do when we do workovers or
12 re-completions or refracts and this is the result,
13 correct?

14 A. That's correct.

15 Q. It's a well-by-well story that you have to
16 tell if your industry is sitting here today, correct?

17 A. That's correct. And we also had to create a
18 new query that fit marginal wells to even be able to
19 pull what wells those could have been.

20 Q. Okay. I want to try and complete, I think,
21 the story you're trying to tell. And please, I do not
22 want to put words in your mouth, but what you're
23 telling the Commission is, if you adopt this
24 rulemaking, there's going to be additional economic
25 considerations on an operator like even Oxy when it's

1 going about deciding whether it's going to do any of
2 these activities that you testified about that
3 occurred on these three wells, correct?

4 A. That's correct.

5 Q. And it might change the decision and lead
6 the operator to plug and abandon the well before even
7 experimenting and trying these procedures, correct?

8 A. That's correct.

9 Q. I want to just briefly revisit your
10 testimony with Mr. Rankin about -- I'm sorry --
11 Ms. Morgan [sic], I'm sorry, about Mr. Alexander's six
12 criteria.

13 A. Yes.

14 Q. And you're concerned about the fifth one,
15 which had the words guesswork and speculation in it,
16 because, for example, these three stories that you
17 told here today, there's a certain amount of guesswork
18 and speculation going into whether it's going to work
19 or not, correct?

20 A. Absolutely.

21 Q. We don't have any guarantees in our business
22 that production is going to be restored if we go in
23 and put in a casing patch or a refrac or any of those
24 things, correct?

25 A. Correct.

1 MR. CLOUTIER: All right. I appreciate your
2 time. Thank you for being here, Ms. Wallace.

3 THE WITNESS: Thank you?

4 HEARING OFFICER ORTH: Thank you,
5 Mr. Cloutier.

6 Mr. Suazo.

7 MR. SUAZO: Just a few questions.

8 CROSS-EXAMINATION

9 BY MR. SUAZO:

10 Q. Good morning, Ms. Wallace. How are you?

11 A. Good. Probably as tired as everyone in this
12 room.

13 Q. So I just have a few questions based on some
14 of the questions that Mr. Tremaine asked you and based
15 upon the testimony that we've heard this week from
16 applicants and the Division.

17 Is it fair to say that based upon what
18 we've heard last week and this week that the focus of
19 the wells and operators that OCD is concerned about is
20 more narrow than maybe the rules might portend upon a
21 plain reading of those rules?

22 A. I believe so, yes.

23 Q. Okay. And you used to work in the Division,
24 correct?

25 A. I did.

1 Q. And were you part of any rulemakings as part
2 of that role?

3 A. I was.

4 Q. Was there a process that was utilized or
5 recommended to maybe hone in on some of the more
6 substantive particulars of rules that was used?

7 A. Yes.

8 Q. Can you tell us more about that?

9 A. I think it depended on the rule. The very
10 big one for which I was involved was the waste rule
11 and venting and flaring rules. And we went through a
12 grueling but effective process over a couple years for
13 that.

14 Q. Okay. And during that time, what occurred?

15 A. Stakeholders of all shapes and sizes met and
16 got in a room and we hammered out concerns and intent
17 around the rules and then tested various factors
18 around that language.

19 Q. Is there anything that you might recommend
20 to the Division and the Commission for how we might
21 kind of bridge the gap on the application of some of
22 these proposed rules?

23 A. I think we should all get in a room together
24 and talk it out, is my general approach to most of
25 these things.

1 MR. SUAZO: Thank you, Ms. Wallace. No
2 further questions?

3 HEARING OFFICER ORTH: Thank you.

4 Mr. Rankin, do you have redirect?

5 MR. RANKIN: I do, mch. Thank you.

6 REDIRECT EXAMINATION

7 BY MR. RANKIN:

8 Q. Ms. Wallace, you were asked by Mr. Tremaine
9 a couple questions about how Oxy had gone in and done
10 some of this work to increase production in these
11 marginal wells. Do you recall that line of questions?

12 A. I do.

13 Q. And that, as a result of that effort and
14 that work, Oxy was able to turn around the production
15 of these marginal wells. And then he asked you if
16 that was an effort that would prevent waste?

17 A. Yes.

18 Q. Do you recall that?

19 A. Mm-hmm.

20 Q. But on the question of whether or not and to
21 what extent this rule prevents waste, can you explain
22 whether there are potential or could be potential
23 impacts on economically sensitive wells, which -- and
24 you testified include marginal wells under this
25 proposed rule?

1 A. Meaning, if they're economically challenged,
2 more further burdens, could their choices be different
3 for them.

4 Q. Yes.

5 A. Yes.

6 Q. Explain your concerns around the proposed
7 rule and how it could impact what you described as
8 economically sensitive wells being these marginal
9 wells.

10 A. Right. So my concern would be that if,
11 again, that lasso is too broad with these wells and
12 the burdens that we put on them, that we could end up
13 needing to make choices that are premature; be that
14 plugging the well, be that -- you know, I'm not sure
15 what the other choices would be because I'm not sure
16 if we could even sell them at that point, which
17 they're normally pretty marketable. But at that point
18 I'm not sure anyone else would want to be further
19 burdened with them as well.

20 Q. Explain, if you would, the concerns that
21 there, that there could be -- explain, you know, the
22 impact of premature plugging, potentially drilling
23 unnecessary wells, unrecovered reserves. Explain, if
24 you would, just kind of loop those together and
25 explain what the downside risk is to the

1 implementation of this rule as proposed.

2 A. I think it would be waste of resources. It
3 could affect -- let's say, for example, we plug a well
4 and have to drill another one later. It's waste of
5 capital. It probably affects mineral and surface
6 owner rights because those are probably a different
7 set of people than the original well. Waste of
8 resources for the state revenue.

9 I'm trying to -- did I answer your
10 question?

11 Q. Yeah, that's a category. So there's
12 potential downsides to the rule, right?

13 A. Yes.

14 Q. And Mr. Tremaine pointed out, walking
15 through the examples of your wells, potential upsides
16 to the rule, right?

17 A. Yes. And the point of showing those was to
18 say that, again, if that if that halo is drawn too
19 wide and we make choices on these wells, we could make
20 decisions that would affect whatever production is
21 left that we could attain, which is waste.

22 Q. Now explain whether, based on your review of
23 the testimony, whether there's been a showing, in your
24 opinion, in any kind of analysis that evaluates the
25 upsides and downsides of this potential rule and

1 whether there's been any kind of opinion showing that
2 the rule will have an overall upside benefit that will
3 prevent waste.

4 A. That the rule as written will prevent waste.

5 Q. Yeah. Has there been any kind of analysis
6 evaluating potential upsides against the potential
7 downsides to demonstrate that the rule overall will
8 prevent waste?

9 A. No, there's not.

10 Q. And just to be clear, that's the concern
11 about the breadth of the rule, right?

12 A. Yes.

13 Q. Now, on the questions about the specific
14 wells that Mr. Tremaine walked through with you. I
15 guess it is the lesson here -- explain your concern
16 about the rule. I mean, effectively, it's a
17 case-by-case or well-by-well analysis, right?

18 A. Absolutely.

19 Q. And that's, that's what's difficult about
20 lumping all these wells into one giant category,
21 right? It's a well-by-well analysis?

22 A. That's correct. There's an entire business
23 within Oxy that looks at these wells to try to decide
24 how to handle them for the future well by well.

25 Q. And it could be mechanical, it could be

1 untapped reserves, it could be reservoir issues. It's
2 a whole range of things that go under that assessment,
3 right?

4 A. Correct.

5 Q. And so it's hard to really categorize them
6 into one giant category, effectively?

7 A. Yes.

8 Q. Then Mr. Tremaine asked you whether or not
9 Oxy had expended any resources or time to evaluate
10 questions of waste, correlative rights or plugging
11 costs for its part under this rule, correct?

12 A. Yes.

13 Q. But Oxy is not the applicant of this
14 rulemaking, right?

15 A. No.

16 Q. And so it wasn't Oxy's burden or job to put
17 those numbers together to show, right?

18 A. No. We just wanted to illustrate the case
19 and the impact of the rule.

20 MR. RANKIN: No further questions, Madam
21 Hearing Officer.

22 HEARING OFFICER ORTH: All right. Thank
23 you.

24 Commissioner Ampomah, do you have
25 questions of Ms. Wallace?

1 COMMISSIONER AMPOMAH: Yes, I do.

2 Wallace, thanks so much for your
3 testimony today.

4 And, Mr. Rankin, if it's possible to
5 bring up the slides. Thank you. And let's start
6 from slide number 3 if you can. Thank you.

7 EXAMINATION

8 BY COMMISSIONER AMPOMAH:

9 Q. So, Ms. Wallace, you talk about the reason
10 behind striking down number 7 is that you want the
11 Division -- and you added there too to have
12 flexibility.

13 So from OCD's point of view, don't you
14 believe that if the Commission is to strike out the
15 speculative purposes that still gives OCD the needed
16 flexibility to implement this definition?

17 A. I believe that would certainly help, yes.

18 Q. Now, with regards to the imaginal wells,
19 number 2, you'll strike that one, too, so there has
20 been a lot of discussion trying to reach a consensus.
21 And it sounds to me that probably marginal is probably
22 going to stay.

23 Will Oxy support the 750 BOE instead of
24 the 1,000 and then also still we keep the 180 days as
25 a compromise?

1 A. Yes. If the marginal well stays in, then we
2 think that's appropriate.

3 Q. Let's go to slide number 5. So you strike
4 out 13 to still keep the 15 months. My question is,
5 what difference does it make to the operator?

6 A. The extra two months are just part of our
7 process now. There's a lot that goes on deciding what
8 to do with these wells. I think it was mentioned lots
9 of approvals, lots of presentations, lots of analysis,
10 both reservoir and economic.

11 And we struck this because we didn't see
12 a reason presented or data presented that the extra
13 two months was a problem. And if it's about
14 collapsing the deadline a little, I believe the
15 beneficial use provision already does that.

16 Q. Thank you. Slide number 6. So are you
17 familiar with EPA's definition of marginal wells?

18 A. Oh, probably in the back of my mind
19 somewhere. But without it here, I probably couldn't
20 speak to specifics. But go ahead.

21 Q. Yeah. So, I wanted to ask you if you
22 compare EPA's definition to the applicant's
23 definition. And even the 750, if we are to replace
24 that, see that as really, really, really extremely
25 good compromise?

1 A. Okay. I see what you're saying. I think
2 that the statement was made in previous testimony that
3 the EPA's definition is more restricting than where we
4 would land. I can't disagree with that I agree with
5 that statement.

6 Our basis for rejecting this here is
7 based off statutory legal language.

8 Q. Slide number 8. So looking at the
9 applicant's description on number D, so Mr. Tremaine
10 discussed this with you a little bit. So if you look
11 at Number 2, beginning -- I believe it was changed
12 from January to May 1, 2028, an operator shall provide
13 a one-well plugging financial assurance for each
14 marginal well.

15 Do you believe that this provision
16 provides operators enough time, opportunity to rework
17 the affected wells to be moved from marginal wells
18 category to avoid the 150,000 single-well bonding?

19 A. I think having the phase-in, the delay is
20 helpful. It's a material change. Should all of this
21 hold, whether or not I can say that that will work for
22 every operator, I don't know. There's a lot to
23 consider.

24 You know, testimony this week has
25 suggested that operators can go look at their

1 portfolios and make some decisions and then go out and
2 work them over and/or plug them. All of that takes
3 funding. Our budgets for next year, we're already
4 through that cycle. So we would have had to have
5 budgeted for the extra plugging and/or extra
6 workovers, at least for next year, by now.

7 And so you're talking three years,
8 you're talking budgeting, as well as the timing of,
9 you know, regs and everything else that goes with it.
10 So it's a hard question for me to answer for everyone,
11 but I do appreciate that a delay was built in of some
12 sorts.

13 Q. And so definitely, Oxy and the applicant and
14 OCD had a discussion on all these provisions. Was
15 this something that came up?

16 A. No. Well, we talked about the marginal
17 wells in general, right? We did not -- we agreed to
18 disagree that the marginal well provision should even
19 exist.

20 Q. And as you sit here today, Oxy, and I'll ask
21 the same thing to NMOGA, and then also IPANM, do you
22 not really have any timeline that they would like this
23 provision to kick off?

24 A. I can't answer for everyone else. More time
25 is better, but I understand, again, you're threading a

1 needle here to try to also have impact for the state,
2 for which the purpose of the role is being drafted.

3 If Oxy were delivered this date, we
4 would find a way. Will it be difficult? Absolutely.
5 Are we already down a year on capital budgeting?
6 Absolutely. So we're already -- you know, that first
7 year, because of the timing of this, I believe most
8 companies' budgets are already settled for next year.

9 Q. Thank you for that. And then also on number
10 3, there has been a discussion. So is Oxy more or
11 less supporting the 30-year at the 30 percent, at
12 least if this provision is still going to stay?

13 A. We think 30 percent is more appropriate.

14 Q. Thank you. So you disagree the marginal
15 well definition in general, but you've talked about
16 riskier wells. Do you have a definition of the
17 riskier wells to the Commission for our consideration?

18 A. I do not. I do agree, though -- I know the
19 intent of what marginal well was trying to do. I
20 think if we can, you know, reduce some of the
21 parameters or increase, depending, right, increasing
22 percentages and reducing BOEs, I think that that is
23 likely to get better at the true riskier wells than
24 both that aren't.

25 Q. Okay. So let's look at your strikeouts

1 here. Now, there is a consensus on the potential
2 language about the exceptions that we've discussed and
3 the applicant discussed with you using this
4 Mr. Alexander's proposed six points.

5 Now, my first question will be, so you
6 said you do not have any problems with all of them
7 except the number 5. But what about number 6? Well,
8 you're saying that carefully crafted to avoid any kind
9 of loophole leading to abuse.

10 Any comment on that one?

11 A. Yeah, I see your point. I think that one
12 can be a little difficult because I don't think
13 operators are looking to point out loopholes. And so
14 it would be almost the Division saying to us, "We feel
15 like the plan that you proposed would have a loophole
16 for abuse."

17 And, again, that's subjective, and
18 certainly not the intent of Oxy or any operators I
19 know.

20 Q. So do you believe that at least number 1,
21 limited in scope, number 2, limited in time, number 3,
22 subject to periodic OCD review, and number 4, based on
23 sound engineering, technical, economic, and
24 administrative information, more or less covers what
25 the intention was for number 5 and number 6?

1 A. One hundred percent agree. And I'd say that
2 those are things that we -- conversations we have now
3 with the Division.

4 Q. Is there any addition that Oxy will add to
5 this, or would Oxy be willing to review this more in
6 detail and then provide some suggestions to the
7 Commission for our consideration?

8 A. I'm definitely willing to review and provide
9 suggestions. And I think as long as some discretion
10 is left to the Division, there could always be
11 something else that could come up for the Division to
12 consider, but that would be on a case-by-case basis.

13 Q. Let's go to slide number 8 -- number 9.
14 Let's go to number 9. So you highlighted where it was
15 crossed before, and then you want us to keep the two
16 years in there.

17 Was this discussed with the applicant,
18 and can you share with the Commission what -- what did
19 you guys reach on this one?

20 A. I don't remember. I'm pretty certain we
21 discussed almost everything at some level. On some
22 subjects, we just saw quicker consensus, and so we
23 moved to those subjects. I don't remember if we
24 discussed this one explicitly or not.

25 Q. Then let's go to slide number 10. I want to

1 ask you the same -- the top one, the two years. What
2 is going to be the impact of this two additional years
3 to the industry?

4 A. Well, I think, if I'm on the right one, it
5 would be that wells -- okay. This is a legal argument
6 that I think we also covered as part of cross, where
7 it was our belief that additional CPI adjustments, if
8 wells were already maxed out at the blanket bond
9 limit, would not be allowed. If that is not the case
10 or the intent, then it would be a moot point.

11 Q. Okay. Yeah, let's go to slide number 12.
12 So slide number 12, you highlighted your provision on
13 the changes. So you strike out "is in compliance with
14 federal and state oil and gas laws and regulations."

15 So did Oxy discuss this with OCD, and
16 was there any consensus on this one?

17 A. Yes, with OCD and WELC. And I believe we
18 all agreed to this language, although there has been
19 testimony this week and myself included that a couple
20 of these terms might need some refining.

21 Q. So the lawyers will work on that to provide
22 the Commission with the final ruling?

23 A. Yes, the lawyers will.

24 Q. I appreciate that. Thank you. Let me see
25 if I have more questions?

1 Let's go to slide number 20, and I think
2 I'll be wrapping up pretty soon here. So you strike
3 out the 30 days. And you listen to Mr. Powell's
4 testimony on this. He provided a justification to
5 keep the 30 days because he said for -- I remember he
6 said that for a well to probably be in a TA status,
7 that be probably 12 months, so you don't really need
8 more time.

9 What is your response to that?

10 A. Oh, I'd say I understand where Mr. Powell
11 was going with that. But I'm not sure that he can
12 decide whether we need more time on a case-by-case
13 basis because he's not as aware of the situations that
14 we're going through with each individual well. I do
15 understand his perspective, though.

16 Q. So number 3, you brought up the
17 continuously. Don't you believe that this will be a
18 loophole for operators, you know, to more or less
19 continuously abuse the provision?

20 A. So I understand the Division's concern.
21 They have testified that they have seen wells just
22 opened up to produce to keep them out of the
23 definition of inactive.

24 I think there are always abusers to any
25 system in life. And are there some people who do

1 that? Probably. The Division would have the data on
2 that.

3 However, I think there's also a catch-22
4 of if you don't say continuously inactive, then
5 there's this regulatory uncertainty for the rest of us
6 who aren't just, you know, putting our wells open for
7 a day or two to defy the definition, and then do Oxy's
8 wells fall in an inactive status because they weren't
9 producing enough.

10 Q. Now, would that not be in conflict with the
11 definition of the beneficial use or, let's say, the
12 marginal well definition?

13 A. Potentially. Beneficial use has parameters
14 that are pretty well honed on what a well should --
15 would have to not be doing to have to then justify
16 beneficial use.

17 Q. Slide number 25, so you crossed out the
18 geological evidence, geophysical data and on. You
19 know, so I do agree with that, but Mr. Powell provided
20 a strong justification as to what he believes this
21 should stay. Do you have any response to that?

22 A. I don't remember exactly what he said on
23 this one, but I think that in general, the Division --
24 sometimes the Division likes the explicit statements
25 within a rule so that it's clear to the regulated

1 party what they have to provide without the Division
2 doing more work.

3 I would agree in general. However,
4 given this provision, I think sometimes some of these
5 are not applicable. And so we struck it because we
6 felt that the Division could handle on a case by case
7 to say, "What would you like to see for approval of
8 this," X, Y, Z.

9 But I also have discussed with the
10 Division, and they'll love me for this, that they an
11 do -- they can and they do do guidance documents where
12 if they see particular situations are coming up more
13 often, they can then issue a guidance document to say,
14 "In this situation, these are the things we want to
15 see." And I think that specificity would be more
16 appropriate there, while still allowing the Division
17 all the discretion it needs in the rule to ask for
18 what it wants.

19 Q. So I do have only one or two questions.
20 Only. So let's go to slide number 26. Down on the
21 last sentences, you strike all of them out. And there
22 has been a lot of discussion with OCD and also even
23 the applicant on this.

24 So if we are to -- where it is stated,
25 "An extended time shall not exceed two additional

1 years," with regards to all the exceptions that we've
2 discussed, I was proposing that instead of "shall," we
3 just make it "may not." Would you agree to that?

4 A. I'm sorry, Commissioner. Can you point to
5 exactly where you would suggest the change? Oh, I can
6 see.

7 Q. Yeah, right there.

8 A. Okay. So you would change it to an extended
9 term shall not --

10 Q. May not.

11 A. -- may not exceed two additional years upon
12 which time the operator shall.

13 Yes. Now clarifying question. Are you
14 meaning after the first five years is approved?

15 Q. Yes. So here, they're saying that once you
16 get the two-year extension, no more, you're done.

17 A. Mm-hmm.

18 Q. And so you were saying that you want OCD to
19 have some flexibility. And even for your operations,
20 especially with CO2 and enhanced recovery. So in order
21 to more or less give some room here to have wells to
22 more or less progress after the two years, we're
23 suggesting that we put "may not" instead of "shall
24 not."

25 A. Yeah, I see what you're saying there. I

1 think there would probably have to be some language
2 that would explain how that would then work,
3 consistent with those first four points you were
4 talking. Like, you know, "shall" -- like, let's
5 pretend that Oxy came to the Division with a 15-year
6 program. Is that allowed? Like a 15-year, like wells
7 would be in TA for a 15 years. Do you see what I'm
8 saying?

9 Versus come to the Division and say,
10 we're going to come for a 15-year program and then we
11 have to revisit. Well, as the rule stands, it would
12 not be allowed for some of those wells after seven
13 years.

14 Okay. If we made the change, are we
15 coming to revisit every five years? Are we coming to
16 revisit every two years to check on that program? Or
17 is it just approved as is, unless there's changes?

18 You see, this is where it gets a little
19 bit -- and why we wanted the discretion to be left in
20 full to the Division.

21 Q. Is this something that, this one, the
22 attorneys can really discuss this and provide some
23 clarity to the Commission on this?

24 A. A hundred percent. I'm signing them up for
25 more work.

1 COMMISSIONER AMPOMAH: Thank you for your
2 testimony. I do not have any further questions.
3 Thank you.

4 HEARING OFFICER ORTH: Commissioner Bloom is
5 on the platform. Commissioner Bloom do have
6 questions of Ms. Wallace?

7 COMMISSIONER BLOOM: Yes. Hi. Good
8 morning, everyone. My camera is not working. It
9 tends to -- it's been going in and out the past few
10 days.

11 But after some questions raised by
12 Mr. Tremaine and some questions from Dr. Ampomah, I
13 do not have any further questions. So, Ms. Wallace,
14 thank you very much for your testimony.

15 THE WITNESS: Thank you. Feel better.

16 HEARING OFFICER ORTH: Thank you. Chair
17 Chang, do you have questions?

18 CHAIR CHANG: I was tempted, but I'm going
19 to maintain my streak here and give --

20 THE WITNESS: So you're going to break your
21 streak on me?

22 CHAIR CHANG: -- everybody their hour for
23 lunch, unless you want to assign any more work to
24 your attorneys.

25 THE WITNESS: Well, we're probably working

1 through lunch, so I don't know.

2 HEARING OFFICER ORTH: All right. Yeah, we
3 can still have an hour, even if we leave in a few
4 minutes. So if there's no reason not to excuse
5 Ms. Wallace, why don't we take a lunch hour until
6 1:05.

7 (Lunch Recess from 12:04 to 1:05 p.m.)

8 HEARING OFFICER ORTH: Mr. Rankin, are we
9 turning to Ms. Montgomery?

10 Mr. Tucker.

11 MR. TUCKER: Hi. Good afternoon, Madam
12 Hearing Officer. Aaron Tucker, for the record, and
13 I'll be examining Ms. Montgomery.

14 HEARING OFFICER ORTH: And she's on the
15 platform, as I understand it?

16 MR. TUCKER: Yes, she's on the platform.

17 HEARING OFFICER ORTH: Sheila, will you give
18 her the permissions, all the permissions.

19 MR. TUCKER: And if I could please get
20 permission to share my screen.

21 HEARING OFFICER ORTH: Ms. Montgomery, would
22 you spell your first and last name for the record.

23 THE WITNESS: Yes. It's Kelley Montgomery,
24 K-E-L-L-E-Y, last name, M-O-N-T-G-O-M-E-R-Y.

25 HEARING OFFICER ORTH: Thank you. And do

1 swear or affirm to tell the truth?

2 THE WITNESS: I do.

3 HEARING OFFICER ORTH: Thank you.

4 Go ahead Mr. Tucker.

5 MR. TUCKER: Thank you very much.

6 KELLEY MONTGOMERY,

7 having first been duly sworn, testified as follows:

8 DIRECT EXAMINATION

9 BY MR. TUCKER:

10 Q. Ms. Montgomery, could you please state your
11 name and your role at Oxy.

12 A. Sure. It's Kelley Montgomery. I'm employed
13 in Houston, Texas. My current responsibilities are
14 I'm the vice president of our air programs, but I
15 spent the last 10 years as our regulatory director in
16 the Permian.

17 Q. Thank you. Could you please describe your
18 educational background and professional
19 qualifications.

20 A. Sure. I have a BS in mechanical engineering
21 and am a registered professional engineer in Texas. I
22 have been with Oxy for 34 years, and in that time,
23 I've been a production engineer and environmental
24 engineer. And then the latest has been regulatory
25 director.

1 Q. Is Oxy Exhibit C a copy of your testimony?

2 A. Yes, it is.

3 Q. Do you have any changes or clarifications to
4 your testimony?

5 A. No, I do not.

6 Q. Let's go to slide 2. Could you please give
7 us an overview of the current framework for temporary
8 abandoned status?

9 A. Sure. The existing rules for temporary
10 abandoned status are really in three bullets, as you
11 can see here. We have 19.15.25.12, and that's where
12 the rules give the OCD authority to place wells in
13 temporarily abandonment status, and I may say TA
14 status as we go on so I don't get tongue-tied, for up
15 to five years.

16 And, they also provide discretion to the
17 Division to extend the status for good cause shown.
18 Also in that portion of the regulation, they limit the
19 number of TA'd wells an operator can have, depending
20 on the size of the operator and number of wells they
21 have.

22 Second bullet or second portion of the
23 regulation is 19.15.25.13, and this talks about the
24 evidence that an operator needs to submit on the
25 casing and cementing, et cetera, when seeking approval

1 for TA status.

2 And finally, we get to 19.15.25.14, and
3 this identifies the mechanical integrity that we must
4 perform in order to seek approval for temporary
5 abandonment status.

6 Q. Thank you. And are you aware of any
7 deficiencies with the existing process for temporary
8 abandoned status?

9 A. No, I'm not.

10 Q. Let's go on to slide 3. What concerns does
11 Oxy have about WELC's proposed limitations on
12 extensions for temporary abandonment?

13 A. Sure. So first, I'll just orient you a
14 little bit. These slides are very similar to
15 Ms. Wallace's. You have the WELC proposal on the left
16 in red. You have Oxy's modification that's shown in
17 kind of the green highlights, and then kind of the
18 rationale for the reason. So I'll pretty much focus
19 on the rationale.

20 What we're proposing is to eliminate
21 portions of the WELC proposal, of the additions here
22 in Subsection B, that limit the authority of the
23 Division to extend the temporary abandonment status to
24 longer than two years.

25 So we believe the Division should retain

1 full discretion on the length of time that a well may
2 be eligible for TA. And there's a couple of reasons
3 for that. We are very heavily involved in enhanced
4 oil recovery projects. We've been very successful
5 with these projects. And these projects definitely
6 benefit from an inventory of TA wells, which we'll go
7 into a little bit later.

8 Well, actually, I'll talk about it now
9 and I'll show a graph of it later. We have some
10 examples in our Hobbs unit where 49 wells that were
11 TA'd were converted to either production or injection.
12 And they have had amazing results.

13 When you convert these wells, they can
14 take a long time. And there's a variety of factors
15 for that. We have -- you can get the economics,
16 you've got the regulatory hurdles to get you all your
17 approvals for your injection, you've got
18 infrastructure concerns and timelines, and then just
19 the general technology.

20 Q. I'd like to stay on this slide for just a
21 little bit longer. WELC proposes to require that
22 extensions be subject to the adjudicatory proceedings
23 in 19.15.4. Oxy is opposed to that change, correct?

24 A. Correct.

25 Q. And can you explain, provide an explanation

1 for why Oxy has concerns with requiring a hearing for
2 extension requests?

3 A. Yes. I think it's logistically impractical.
4 When you are looking at an extension request, you have
5 a very -- the timing that it takes to get on the
6 docket, to put it together, and to get an actual
7 order, I worry about our compliance from a Division
8 standpoint and from an operator standpoint, that
9 timeframe it takes to get to that point.

10 Q. Thank you. Let's go to slide 4. What
11 concerns does Oxy have about WELC-proposed eligibility
12 restrictions for temporary abandoned status?

13 A. Yes. So, Oxy, we propose to eliminate a
14 portion of the proposed additions in Subsection C.
15 And this section right here that they've added limits
16 the eligibility of wells to be a TA status to only
17 those that have been inactive for less than three
18 years.

19 We believe the Division should retain
20 full discretion, as I said earlier, over the wells
21 which are eligible for TA status. EOR projects,
22 enhanced oil recovery projects, they frequently
23 benefit from an inventory of TA wells. And many of
24 these wells will have been inactive for three years or
25 more. And if we allow wells that can pass and do pass

1 mechanical integrity testing to be granted TA status,
2 it won't only assist in continued help with our
3 enhanced recovery, but also it prevents operators from
4 having to prematurely plug wells or, in Oxy's case,
5 having to drill new wells for our EOR projects.

6 Q. Let's talk a little bit more about enhanced
7 oil recovery. I'm going to move to slide 5. How are
8 wells in temporary abandoned status utilized in
9 enhanced recovery projects?

10 A. So, I can give you some examples of how I've
11 seen it used. And when I take like the South Hobbs
12 unit in particular, when it was on primary and water
13 flood, we were on 40-acre spacing, then we went to --
14 I mean, excuse me -- yeah, 40-acre spacing. Then we
15 went to 80-acre spacing at the initial.

16 And then over time, we come back and
17 reworked these wells to target different zones, to, I
18 mean, manipulate the flood, to work with how -- to
19 understand how the flood is going. So, we've used
20 these to turn on and off different portions of the
21 field.

22 I've even seen projects that I've worked
23 on in my past that go down to 10-acre spacing. It
24 just, it varies as you're working the flood to try to
25 make the best of your enhanced oil recovery project.

1 Q. And what are the timelines for developing
2 enhanced oil recovery projects?

3 A. Oh, gosh. So they can take many years. I
4 can say just, in particular, the South Hobbs that I
5 was involved in, we went to hearing in 2012, 2013, and
6 didn't end up actually putting the -- starting the
7 flood until maybe around 2014, 2015.

8 And the logistics of that are your
9 regulatory approvals and then, of course, your
10 infrastructure changes. There's a lot of
11 infrastructure changes that are associated with these
12 type of projects.

13 Q. Thank you. Moving on to slide 6, what
14 safeguards exist for wells in temporary abandonment
15 status?

16 A. Well, we're not proposing to change any of
17 the existing rules that provide the safeguards. You
18 have your mechanical integrity test that these wells
19 have to demonstrate to show that they do no harm and
20 they have -- in casing integrity.

21 All we are asking really here is for the
22 Division to have discretion to tailor the timeframe
23 for a temporarily abandoned well to the conditions of
24 a particular circumstance, a particular operator, a
25 particular well.

1 Q. Thank you. I'm going to move to
2 Ms. Montgomery's rebuttal testimony. Ms. Montgomery,
3 what is Oxy's response to WELC's proposed time limits
4 for temporary abandonment?

5 A. Well, the proposed timeline would give
6 operators a maximum of seven years to either return
7 the wells to beneficial use or to permanently plug the
8 well and restore and remediate the location.

9 This whole timeframe is just premised on
10 the idea that wells in TA status for longer than seven
11 years don't have a beneficial use. But we can
12 demonstrate that hasn't been the case for Oxy.

13 Q. And can you provide us some specific
14 examples showing the value of wells and temporary
15 abandonment for more than eight years?

16 A. Yes. Do we want -- yeah. There we go.
17 That froze up for a second. Can you still hear me.

18 Q. Yes, we can hear you. Thank you.

19 A. OK, I apologize. I'm on wifi.

20 So let me orient you to this graph here.
21 On the bottom is time, and time goes from the 2000s
22 all the way to present day in 2025.

23 What you see on the left is your oil
24 production in barrels per day. And that's represented
25 by the green line.

1 And then on your right, you're going to
2 have gas production in MCF per day, and that's
3 represented by the red line.

4 So what we did here is we looked in our
5 Hobbs unit that is in New Mexico and I'm most familiar
6 with. And we took 49 wells. And these are wells that
7 have been in temporarily abandoned status for varying
8 lengths of time. And in the last ten years, you can
9 see very clearly when we started bringing wells back
10 on, either to production or injection during that
11 time. And so you see you go from a very flat or
12 declining oil to double, triple, quadruple, and more
13 the oil production by bringing those wells back
14 online.

15 Q. In this graph, do you know how many of the
16 wells were in temporary abandoned status for more than
17 eight years?

18 A. Yes. So we have 45 percent of those wells,
19 almost half, had been in TA status for more than eight
20 years, and 21 have been in TA status for more than ten
21 years.

22 Q. What would have been the consequences if
23 WELC's proposed rule had been in place for these
24 wells?

25 A. These wells would have been plugged and

1 abandoned, we would have lost the assets and we would
2 have had waste because we would probably not have
3 produced these wells. We would have had to drill new
4 wells, and that's a whole economic decision, whether
5 you're going to drill those wells or not.

6 So there would have definitely been some
7 waste or the expenditure to drill new wells to get
8 this production.

9 Q. What does this data demonstrate about the
10 time limits and value of Division discretion?

11 A. So it's critical, I think, that we utilize
12 the strengths of the Division to be able to have
13 discretion over TA status of wells. If a well is
14 properly TA, it demonstrates mechanical integrity and
15 it has beneficial use, and we can demonstrate that we
16 have a timeline, that we have a proper use for these,
17 that they're not at risk for being orphaned, if you
18 will, then I think that we should allow the Division
19 to have that discretion.

20 Q. In your opinion, how would WELC's proposed
21 rule result in waste?

22 A. Well, for one, we would be plugging a lot of
23 these wells, so then we would have to make a decision
24 whether it was economic or the timeline to drill a new
25 well. It may not be in some cases, so you would have

1 waste. You wouldn't recover the resources that you
2 can recover in an enhanced oil recovery project.

3 Q. And just to summarize for the commissioners,
4 what is your recommendation?

5 A. My recommendation is that we allow the
6 Division to have discretion over temporarily abandoned
7 time limits. The current way that it's being handled,
8 that an operator proposes and provides the information
9 that's relevant to this, that the Division needs to
10 make a decision, and we continue with the current
11 process. I believe it has worked well.

12 MR. TUCKER: Thank you, Ms. Montgomery.

13 I'd like to move to admit Exhibit C of
14 Ms. Montgomery's direct and rebuttal testimony as
15 exhibits.

16 HEARING OFFICER ORTH: I'll pause for a
17 moment in the event there are any objections.
18 Exhibit C is admitted.

19 (Admitted: Oxy USA Exhibit C.)

20 MR. TREMAINE: Thank you. We'll pass the
21 witness.

22 HEARING OFFICER ORTH: Thank you.

23 Ms. Fox or Ms. O'Grady?

24 MS. O'GRADY: Yes, thank you so much. Just
25 a short set of questions.

1 CROSS-EXAMINATION

2 BY MS. O'GRADY:

3 Q. Good afternoon, Ms. Montgomery. My name is
4 Morgan O'Grady. I'm an attorney with the Western
5 Environmental Law Center for applicants. And I am
6 going to pull up a slide in just a moment.

7 Ms. Montgomery, are you familiar with
8 applicant's expert Tom Alexander's testimony?

9 A. I was not able to listen to his testimony,
10 no.

11 Q. Okay. So you're not familiar with the graph
12 before us on the screen?

13 A. I've never seen it before.

14 Q. This graph shows data demonstrating that
15 wells on average across all operators in New Mexico
16 within a certain range of time, that's identified at
17 the bottom of the page, it shows that wells on average
18 tend to not come back into production after a certain
19 amount of time.

20 And my question to you is, do you have
21 any data -- and specifically, do you see on the screen
22 that 99.5 of the sample reactivations occurred within
23 eight years?

24 A. I mean, I see it written. Well, I don't see
25 99. I think I see 90 plus percent on this

1 particular -- are you asking me if I can see -- oh,
2 99, there you go, 99 percent of the sample -- thank
3 you for that, occurred within eight years. Okay.

4 Q. And do you agree that the seven years plus
5 one year of inactivity come out to eight years of time
6 in the proposed rules that a well can remain inactive?

7 A. In the proposed rules, yes.

8 Q. Does Oxy have any data that you have
9 presented testimony on, various wells of Oxy's that
10 have come back into production after much longer
11 periods of time in association with, for example, EOR
12 projects? Do you have any data on Oxy's reactivations
13 over time?

14 A. Other than what I just presented.

15 Q. Yes.

16 A. No, not other than what I just presented.

17 Q. Do you have any reason to dispute that this
18 data is representative of reactivations across all
19 wells in New Mexico and all operators?

20 A. No. I have no idea where the data came
21 from, so I have no basis for that. I could just tell
22 you where Oxy -- about our data.

23 MS. O'GRADY: I understand. Okay. I'll
24 conclude my questions there. Thank you so much,
25 Ms. Montgomery.

1 HEARING OFFICER ORTH: Thank you.

2 Mr. Tremaine -- or Mr. Hall.

3 MR. HALL: Thank you, Madam Hearing Officer.
4 Just a couple questions.

5 CROSS-EXAMINATION

6 BY MR. HALL:

7 Q. Hi, Ms. Montgomery. My name is Michael
8 Hall. I'm an attorney with the Oil Conservation
9 Division. Nice to meet you.

10 A. Nice to meet you, too.

11 Q. Now, I have a couple questions specifically
12 about Oxy. Are you aware whether Oxy had an excess of
13 100 wells that produce less than 90 barrels of oil
14 equivalent in fiscal year 2024?

15 A. I think I heard that when you were talking
16 with Ms. Wallace earlier, but that would be my only
17 knowledge of that.

18 Q. Do you have any reason to dispute that?

19 A. No, I don't. I just don't have the data in
20 front of me. No.

21 Q. Are you aware of significant downhole
22 mechanical reasons why Oxy would have so many wells
23 0producing so little petroleum?

24 A. Well, you know, if you looked at the slide
25 that I showed earlier, the early -- you know, we had

1 some wells in Hobbs that were very, very low
2 producing. I don't know how low. I mean, pretty low.
3 And once we started enhanced oil recovery, they just
4 took off.

5 So there was definitely value in those
6 wells that had very low production that were part of
7 an enhanced oil recovery project.

8 Q. And so, with those wells in particular,
9 would you assume that there were not downhole
10 mechanical issues, since the project was so
11 successful?

12 A. Or they were fixed. Yes, I don't know of
13 any downhole mechanical issues with them.

14 Q. If there are no mechanical issues in these
15 wells that I've asked you about earlier, is there a
16 reason Oxy couldn't produce those for 180 days instead
17 of, say, 90?

18 A. There could be a very -- several reasons.
19 Sometimes you get shut out of a pipeline and you're
20 trying to keep wells on as you're negotiating pipeline
21 or as the plant is doing, you know, a turnaround.

22 That's one that's very common in West
23 Texas and New Mexico that I know of offhand.

24 Q. Nevertheless, if you were able to double the
25 production days, you would expect the production

1 values of any particular well to increase, isn't that
2 right?

3 A. Meaning if the well is on for more days, it
4 would have more production?

5 Q. Yes, ma'am.

6 A. Is that kind of what you're asking? I would
7 assume so.

8 Q. Okay. Are you aware that Oxy, between those
9 two OGRIDS, has 45 wells that produce less than ten
10 barrels of oil equivalent in fiscal year 2024?

11 A. No, no, I'm not familiar with that. I'm not
12 disputing it, but I'm not familiar.

13 Q. Okay. Thank you. Fair enough.

14 Are you familiar with the Sand Dunes 34
15 federal Number 3 well?

16 A. No, I'm not.

17 Q. I'm going to share my screen here. Do you
18 see that Ms. Montgomery?

19 A. Yes.

20 Q. Okay. I'm going to --

21 A. It says "plug site released," so this is the
22 plugged well, right.

23 Q. Yes ma'am. That's my understanding.

24 A. Okay. Yeah.

25 Q. And if I'm not mistaken -- well, you can

1 tell me. But it looks like -- can you tell from this
2 production data when it was likely plugged?

3 A. No -- well -- no -- well, I guess there's a
4 little bit in 2024. Yeah, that was -- there were --
5 it looks like there might have been a bit in 2024,
6 just from looking at your screen.

7 Q. So it's 2025. But from that, it would
8 either be 2024, after the 16 days of production, or
9 2025, where there's no production in volume or days.
10 Correct?

11 A. That's what it looks like on screen.

12 Q. I'll just represent to you this is from
13 OCD's permitting. It's the well-specific query for
14 this well we're discussing, which is an Oxy well.

15 So do you have an explanation or theory
16 as to why, over those last five years, before the
17 plugging, only 72 days of production and only five MCF
18 over that time period from 2021 until the plugging
19 this year?

20 A. So, without knowing the --

21 MR. TUCKER: I'd like to object here. I
22 think this is a little outside the scope of
23 Ms. Montgomery's testimony.

24 HEARING OFFICER ORTH: Mr. Hall.

25 MR. HALL: She specifically pointed out

1 specific Oxy wells to kind of go over her theory, and
2 we're just exploring that a little bit to discuss the
3 overarching reasons behind Oxy's position with regard
4 to the rules.

5 HEARING OFFICER ORTH: All right. So
6 Ms. Montgomery, if you can answer the question,
7 great. And if you don't know, that's fine too.

8 A. Okay. Well, with respect, my testimony is
9 about TA'd wells having the discretion of the Division
10 to bring them on for good cause, and I showed some
11 good cause.

12 But looking specifically at this well, I
13 don't know the specifics of this particular well or
14 why the production shows what it does.

15 Q. Would the fact that it's plugged indicate to
16 you that it was no longer capable of being economic
17 for Oxy?

18 A. Oxy chose to plug this well, so I'm assuming
19 they decided -- well, it could be no beneficial use,
20 it could be they decided that the well bore had too
21 many issues. I mean, there's a -- I don't know the
22 actual reason they plugged this well. But it didn't
23 have a lot of production, so obviously we plugged the
24 well for some reason.

25 Q. And this is kind of the crux of why I'm

1 asking about this. And we're talking about
2 timeframes, correct? And we're --

3 A. For TA'd wells --

4 Q. For TA'd --

5 A. -- and extensions.

6 Q. For TA'd wells, right?

7 A. Yes.

8 Q. We're talking about reasonable timeframes.

9 Any reason this well, it took more than
10 five years, given those production values, to plug it?

11 A. I don't have knowledge of this well.

12 Q. Now, there's been some discussion about --
13 well, I'm going to pull up Mr. Rankin's famous
14 statute, if I can. Excuse me. Well, I don't think
15 that's working.

16 I think I noticed you've watched some
17 other testimony in this hearing; is that right,
18 Ms. Montgomery?

19 A. Only Ms. Wallace's testimony.

20 Q. Okay. Are you familiar with TA bonding in
21 New Mexico?

22 A. No, I'm not. I mean, I know I've heard of
23 it because I listened to Ms. Wallace's testimony, but
24 I'm not familiar with the rule in particular.

25 Q. Okay. Are you familiar that in the event

1 that a company or an operator has in excess of 25 TA'd
2 wells that there's a provision for \$1 million in
3 blanket bonding?

4 A. Not until you just said it, no. I have not
5 been involved in the bonding with this hearing.

6 MR. HALL: Fair enough.

7 I'll pass the witness. Thank you.

8 HEARING OFFICER ORTH: Thank you.

9 Mr. Moore, do you have questions?

10 MR. MOORE: I have limited questions, Madam
11 Hearing Examiner. Thank you.

12 CROSS-EXAMINATION

13 BY MR. MOORE:

14 Q. Good afternoon, Ms. Montgomery. My name is
15 Richard Moore. I represent the commissioner of public
16 lands and the State Land Office in this -- in this
17 proceeding. Thank you for your testimony today. I'm
18 going to share my screen quickly.

19 So in the applicant's proposed
20 amendments to the definitions, expired temporary
21 abandonment or expired temporary abandonment status
22 means the status of a well that is inactive and has
23 been approved for temporary abandoned status in
24 accordance with 19.15.25.13 but no longer complies
25 with 19.15.25.12 through 19.15.25.14.

1 Do you know, is there a -- does the OCD
2 in their permitting have a status of inactive for
3 wells?

4 A. You mean -- so in their permitting, you
5 said. I mean, what do you mean.

6 Q. I guess is that -- is that a status that OCD
7 applies to wells?

8 A. Yes.

9 Q. I guess what I'm asking is, when you look up
10 a well, is "inactive" a category that the well can be
11 described in?

12 A. I'd have to look that up. I mean, we know
13 when we -- I think we -- now you're going to catch me
14 a little bit. I think -- I've seen an expired
15 temporary abandonment status. I believe it's called
16 inactive. Because we know after a certain amount of
17 times it'll show it as -- I think -- I believe it's
18 called inactive. I don't know if that's exactly what
19 it's called, but we know when it's been inactive for a
20 certain amount of time after the year or 15 months.

21 Q. And do you agree with this definition as
22 proposed by the applicants for expired temporary
23 abandonment?

24 A. So, without looking at exactly what the
25 `19.15.25.13, and 14 are -- I believe this question

1 was asked by Ms. Wallace, so I can defer to her
2 answer. If she agreed with it, then I agree with her.
3 I just don't know all the details of some of the
4 references. I apologize.

5 Q. That's all right. Do you think it would be
6 sufficient to define expired temporary abandonment as
7 the status of a well that has been approved for
8 temporary abandonment status in accordance with the
9 regulations, but no longer complies with those
10 regulations?

11 A. Yes.

12 Q. Without reference to inactive in the
13 definition itself?

14 A. Yes.

15 MR. MOORE: I believe that is all that I
16 have for questions. Thank you.

17 HEARING OFFICER ORTH: Thank you, Mr. Moore.

18 Ms. Nanasi, are you with us?

19 Mr. Maxwell, do you have questions of
20 Ms. Montgomery?

21 MR. MAXWELL: No questions, your Honor.
22 Thank you.

23 HEARING OFFICER ORTH: Thank you.

24 Mr. Sayer. No.

25 All right. Mr. Suazo.

1 MR. SUAZO: No questions from NMOGA, Madam
2 Hearing Officer.

3 HEARING OFFICER ORTH: Mr. Cloutier. `

4 MR. CLOUTIER: I don't have any questions of
5 Ms. Montgomery, Madam Hearing Officer.

6 HEARING OFFICER ORTH: Thank you.

7 Mr. Tucker, do you have any redirect?

8 MR. TUCKER: Just a just a couple questions.
9 Thank you.

10 REDIRECT EXAMINATION

11 BY MR. TUCKER:

12 Q. Ms. Montgomery, you were asked some
13 questions by counsel for WELC regarding a graph
14 provided -- prepared by Mr. Alexander. Is Oxy the
15 applicant in this proceeding?

16 A. No, we're not.

17 Q. Is Oxy proposing to place a cap on the
18 timeline for temporary abandonment status?

19 A. No, we're not.

20 Q. Is it Oxy's burden to provide data
21 supporting the rule change?

22 A. No. No, it's not.

23 Q. Thank you. Just a couple more questions?

24 Counsel for the Oil Conservation
25 Division asked you some questions about a specific

1 well. Was that well part of the wells included in the
2 graph that were returned to production in the Hobbs
3 area?

4 A. No. No, it was not.

5 MR. TUCKER: Thank you. No further
6 questions.

7 HEARING OFFICER ORTH: Thank you.

8 Commissioner Ampomah.

9 COMMISSIONER AMPOMAH: Yes, I do have a few
10 questions. And if we can bring back these slides.

11 MR. TUCKER: Yes. One moment.

12 COMMISSIONER AMPOMAH: Thank you. Yeah,
13 let's start from slide Number 2. Thank you.

14 EXAMINATION

15 BY COMMISSIONER AMPOMAH:

16 Q. Yes. So you were asked about if you are
17 aware of any deficiencies in this existing rule, in
18 the existing rule, that cause concerns with integrity
19 of wells in approved TA status.

20 And I presume you -- I recall that your
21 response was no; is that correct?

22 A. That's correct.

23 Q. Now, my follow-up question on that will
24 be -- I'm not sure if you were able to listen to some
25 of the OCD witnesses.

1 A. Unfortunately, I was not, so...

2 Q. Based on the witness statements, they talked
3 about all the issues that they have with the current
4 rules. You know, one example was they talked about 25
5 percent of the operators have now reported production
6 for some years now.

7 So, don't you believe that the current
8 rules, the proposed rules, will more or less give OCD
9 the flexibility to more or less work with these
10 companies to bring them into compliance?

11 A. So if I understand -- I'm trying to
12 understand which -- all the proposed rules, or what?
13 Kind of what are we talking about.

14 Q. Yeah. Let me let me expand on that. So
15 let's say with wells that have not reported production
16 for several years --

17 A. So not necessarily TA'd wells, it's just
18 inactive wells.

19 Q. Exactly. Exactly.

20 A. Okay. Got it.

21 Q. So don't -- go ahead, please.

22 A. No, no, no, please.

23 Q. Yeah, so my question on that one is that
24 even for that simple example that we just went
25 through, don't you believe that the definition of

1 beneficial use and then even TA wells and all of that
2 will give OCD the opportunity to really go in there
3 and work with these operators to bring them to
4 compliance or more or less TA the well?

5 A. So I think Oxy, in general, agrees with a
6 lot of it, and we've worked with WELC on the proposal.
7 And I would have to stand by Oxy's red lines on that
8 for what we agree with on helping the OCD bring these
9 wells into compliance.

10 Q. Yeah, let's go to your slide number 9.
11 Yeah. And thanks so much for bringing this slide
12 because, you know, I'm also a firm believer that wells
13 go through numerous production cycles, you know, the
14 primary, secondary, and then the tertiary.

15 You know, Oxy's case, you know, let's
16 say it will be a great example, but my question to you
17 is, do you have some other examples of operators that
18 have gone through these type of cycles over the years?

19 A. You know, my experience has been with Oxy.
20 I do not -- and this is a great example, and we had it
21 in Hobbs, and it's very timely, but I could say that
22 we have whole divisions in our company that are
23 looking at different types of enhanced oil recovery
24 that will be applicable to many different types of
25 wells.

1 And so seeing the great response we have
2 here in some of our pilot projects, we wouldn't want
3 to have to drill a new well or plug the well
4 prematurely if we can demonstrate that this well will
5 have beneficial use.

6 And we're not -- you know, we would
7 definitely have to demonstrate that. And that's
8 something that we would be prepared to do and think we
9 should be prepared to do.

10 Q. Now, based on all the discussions that we've
11 had for, let's say, a week now, don't you believe that
12 your concerns of OCD monitors having flexibility on TA
13 well administration has been addressed some way,
14 somehow?

15 A. In testimony that it's been addressed.

16 Q. Yes, especially through the exceptions that
17 have been proposed?

18 A. I believe -- I haven't heard all the
19 testimony, so I apologize. And so I'll have to just
20 step back to, you know, just knowing that we have --
21 that the Division has some flexibility, like we have
22 proposed here and Oxy has proposed in the red line.
23 That's really what I'm asking.

24 I'm not trying to avoid the question,
25 I'm just not exactly sure because I haven't listened

1 to all the different testimony.

2 But what we've talked about here, that's
3 exactly what we would propose as Oxy to give us
4 some -- the Division, some flexibility on that TA'd
5 wells for good cause.

6 COMMISSIONER AMPOMAH: Thank you for your
7 time. I do not have any questions?

8 THE WITNESS: Thank you.

9 HEARING OFFICER ORTH: Commissioner Bloom,
10 do you have questions of Ms. Montgomery?

11 COMMISSIONER BLOOM: Yes. Thank you, Madam
12 Hearing Officer.

13 EXAMINATION

14 BY COMMISSIONER BLOOM:

15 Q. Good afternoon, Ms. Montgomery. Thank you
16 for your time today.

17 A. Thank you, Good afternoon.

18 Q. And if we could, could we go back to that
19 slide again that we were just looking at? That'd be
20 helpful.

21 COMMISSIONER BLOOM: Thank you, Mr. Tucker.
22 I appreciate that.

23 BY COMMISSIONER BLOOM:

24 Q. Pull up my question here. Ms. Montgomery, I
25 appreciate your thoughtful testimony today. I think

1 as Dr. Ampomah stated, and I don't think it's lost on
2 any of us up here, that these wells can be resources.
3 And of course Oxy and many other operators see wells
4 in TA status and think resource. And from the OCC
5 lens, you know, and from the lens of the land office,
6 we may also see resource, and a lot of times we see a
7 resource there, but we also see risk, and that weighs
8 on us. We owe responsibility to the state to ensure
9 public health and protect the environment.

10 And I think there's some waste issues in
11 the balance here, as well, when wells are not produced
12 for years and years or a very low production.

13 Mr. Alexander's data shows, I think you
14 saw what the applicants put up, just a little bit ago,
15 that 98.5 percent of wells are back in production
16 after six years. And under this rule, you have eight
17 years. And so I look at this graph and see oil
18 production really dip around 2009, 2010. And by 2015,
19 2016, obviously you'd taken matters -- you'd begun
20 working on this Hobbs EOR project. And right about
21 seven years, eight years, we see oil production
22 increase.

23 Does this speak to some ability that Oxy
24 would have to be able to work these sorts of wells and
25 turn them around before eight years?

1 A. So, you know, Oxy is known for EOR. We're
2 the biggest EOR operator in the well. So this is what
3 we do, and we're very familiar with it. I'm not sure
4 all the other statistics take into account EOR, which
5 is why I really wanted to testify today, to show what
6 can be done if we use EOR.

7 And so the ability to be able to bring
8 our case and show when we have definite plans that
9 we're working through and have that taken into account
10 and have the Division be able to have some discretion,
11 that's really my point here with what I'm doing. And
12 I'm not sure I exactly answered your question. Can
13 you redirect me if I did not.

14 Q. No, I think you did just fine. It was --
15 you know, it was more of a statement than a question,
16 really. And I appreciate that. And certainly when I
17 think of who's doing EOR in New Mexico's Permian, I
18 think of Oxy, of course, and see a company with
19 resources that, you know, takes some dismally
20 producing wells and turns them around, and all of a
21 sudden those wells are producing 2,500 barrels a day.
22 That's significant, and, you know, we have a mandate
23 to produce value for our landowners, our
24 beneficiaries, the school kids in New Mexico, and
25 weigh that and weigh that against risk.

1 And, of course, I see a company like Oxy
2 and think, you know, this is one of the companies I
3 would be, you know, less concerned with than many
4 others that we have. But the point of the value of
5 these wells is not lost on me.

6 So, Ms. Montgomery, thank you for your
7 time and testimony today. I think we've kept you up
8 late if you're actually in London there.

9 A. I am. Thank you.

10 COMMISSIONER BLOOM: Take care.

11 HEARING OFFICER ORTH: Chair Chang?

12 CHAIR CHANG: No. No questions.

13 HEARING OFFICER ORTH: Well, all righty.

14 Any reason not to excuse Ms. Montgomery?

15 Thank you very much, Ms. Montgomery, for
16 your testimony.

17 THE WITNESS: Thank you. I appreciate the
18 opportunity. Have a good evening, everyone.

19 HEARING OFFICER ORTH: I think we move to
20 NMOGA at this point, Mr. Suazo.

21 MR. SUAZO: Thank you, Madam Hearing
22 Officer. Let me pull up some slides. NMOGA is going
23 to make its opening statement and then call its first
24 witness.

25

1 OPENING STATEMENT BY MR. SUAZO

2 All right. Well, good afternoon,
3 Commissioners, Mr. Chair, Madam Hearing Officer. My
4 name is Miguel Suazo. I am with the law firm Beatty &
5 Wozniak, joined today by my colleague, Jacob Everhart,
6 and we are energy and natural resources attorneys. We
7 focus primarily, especially in proceedings like this,
8 on the regulatory side of the energy space.

9 And it's our honor today to be here representing the
10 New Mexico Oil and Gas Association, which, as I'm sure
11 you all know, represents operators, large and small,
12 who provide the infrastructure to the energy backbone
13 of New Mexico's oil and gas industry and help support
14 the state's general fund.

15 Now, NMOGA's members are committed to operating
16 responsibly, safeguarding the environment, and keeping
17 New Mexico the national leader that it is in energy
18 production, while supporting the public institutions
19 that make our state thrive, institutions that myself
20 and my colleague have both benefited from as native
21 New Mexicans.

22 Now, this proceeding is an important one. It is one
23 of the most significant rulemakings that we've had in
24 New Mexico in a long time. And I feel like the
25 applicants that brought this proceeding are

1 well-intentioned, and the Division, who is supporting
2 this proceeding has some very clear concerns that
3 we've been educated about as this proceeding has gone
4 forward. We've learned a lot already at this stage in
5 this proceeding.

6 However, NMOGA and its members have some very
7 significant concerns about what's proposed. And I
8 think that the crux of the issue is not the what, it's
9 the how and the why about the regulations that are
10 being proposed.

11 Now, applicants have asked the Commission to define
12 beneficial use and marginal wells to expand the
13 financial assurance requirements that operators must
14 maintain to operate in New Mexico. And they have
15 specifically asked the Commission to authorize
16 increased financial assurances.

17 Now, we've heard the Division say that there are
18 certain issues in this proceeding that they do not
19 feel they can compromise on. And one of those things
20 was Deputy Director Powell said: We want to decrease
21 the 15 month to 13 months.

22 We heard that, understood. Well, from industry's
23 perspective, there are certain areas where we are
24 willing to work with the parties and the Commission to
25 make sure that the rules that are put in place make

1 sense, not just today, but over the long term. But
2 one of the areas where the industry feels that we are
3 on solid footing is on the authority of the Commission
4 and the Division in terms of what they're able to
5 adopt statutorily.

6 Now, there's been back and forth in this proceeding.
7 We're looking forward to you all hearing from our
8 legal witnesses and their interpretations. There's
9 motions in front of the Commission about that
10 statutory authority. And it's one thing to read the
11 statute, as some folks in the proceeding have done.
12 It's another thing to understand the legal case law
13 behind the interpretation of that statutory authority
14 by New Mexico's courts.

15 And we look forward to presenting those arguments and
16 findings to you so that you can make an informed
17 decision about what the Commission is and is not able
18 to do for purposes of addressing the issues that are
19 so critical to this proceeding.

20 Now, I think one thing that we've learned so far is,
21 you know, it's been presented as an orphan well
22 crisis. And WELC presented, you know, 60,000 wells
23 that are going to ostensibly cost billions of dollars.
24 But I think it's important to remember that those
25 costs are going to be met over time by industry and

1 the public and other parties that are stakeholders in
2 this whole process over a long duration.
3 But I think what's really critical is that OCD's
4 testimony has really allowed us to focus on what they
5 are concerned about. And those are, as they dug, high
6 risk wells and high risk operators. Industry has
7 heard that message.
8 And one of the things that has been brought to the
9 fore in this proceeding is a report from the
10 legislative finance committee. And I'm glad that it
11 has, because I think there's really important
12 information in that report. And if there's one thing
13 that this Commission should do, that I urge you to do,
14 is to read that report in its entirety. Because the
15 information and data in there, I think, can be used to
16 help inform the regulations that this Commission
17 ultimately adopts and that hopefully industry and
18 applicants can ultimately live with.
19 You know, I think that a lot of these proposals have
20 the potential effect to really impact the smaller
21 operators more than some of the other operators. And
22 as somebody who's worked in New Mexico economic
23 development for years, I can't think of another time
24 when a government entity would pass a rule that
25 impacted New Mexico's small businesses.

1 Now, that's not to say that they shouldn't help
2 protect and steward the environment and operate in a
3 responsible manner, but jobs are a premium in a poor
4 state like ours, and I think that should also be
5 brought to the fore and considered as part and parcel
6 of the consideration of these rules.

7 Now, you're going to hear a lot, and you have heard a
8 lot, about whether or not industry was involved in
9 this process. And as best as I can tell, I think that
10 the origination of applicants and OCD's assertions
11 that industry was involved stems back to, I think,
12 some statutory negotiations.

13 Well, this is not a statutory proceeding. This is a
14 rulemaking, and those are two very different
15 proceedings. And I think that it is fair and it is
16 accurate that NMOGA and industry were not made part of
17 this rulemaking proceeding and the lead up to it until
18 just before it was filed. And so I would ask that the
19 Commission appreciate the perspective of NMOGA, not
20 that you have to agree with it, but understand where
21 our members are coming from, that we did not get the
22 input into these rules until just before it was filed.
23 And I think that's unfortunate, because we have
24 learned a lot to date, and I think that industry is
25 getting to the point where we can offer some informed

1 feedback about what is being proposed. And that is
2 where we're going now with the start of our case in
3 chief. And I am really excited for you guys to hear
4 from our witnesses.

5 We have some of the foremost experts on the issues
6 that are before us. And I want to offer them -- you
7 know, originally coming into this proceeding, we
8 thought is going to be more of a critique of these
9 rules. And to be sure, we are going to critique these
10 rules, but our witnesses are also going to help inform
11 the Commission on how these rules can be made more
12 effective, more practical, and more meaningful. And
13 that's important, because the only thing worse than a
14 rule is a bad rule.

15 And at the end of the day, whatever this Commission
16 decides to adopt, it is the regulator, the Division,
17 and the industry that are going to have to live with
18 those rules that are adopted for the long term. And
19 we want to make sure that those rules make the most
20 sense from an operational and administrative
21 standpoint.

22 Now, you're going to hear from our first witness, Dan
23 Arthur, who has decades of experience across a range
24 of oil and gas issues. And he's going to touch on the
25 really critical concerns and provide valuable feedback

1 that the Commission can use to inform the rules that
2 it ultimately adopts.

3 We're also bringing an actual surety expert, a person
4 who's actually issued bonds and reviewed bonds and
5 lived the life in issuing these financial assurances
6 that operators must secure to operate across the
7 nation. And so we're looking forward to him helping
8 you understand the unique financial assurance
9 framework that exists in New Mexico in a well where
10 there's non-cancel bonds and also state and federal
11 issues that must be contemplated in addition to the
12 issues that the OCD considers every day.

13 It is our hope that at the end of this, of our case in
14 chief and at the end of this proceeding, that the
15 Commission will adopt risk-based and market-sensible
16 regulations that industry and the Commission can live
17 with now and over time.

18 And finally, I would like to say that NMOGA considers
19 itself a partner with the Commission and the Division
20 in this process. We're here to help inform your
21 decisions because we want to have a thriving oil and
22 gas industry. We look forward to presenting to you
23 our witnesses and our evidence, and we look forward to
24 working with you on a collaborative solution that will
25 make sense for New Mexico now and over time.

1 Thank you.

2 HEARING OFFICER ORTH: Thank you.

3 Mr. Suazo, we're kind of in an awkward place, an hour
4 from lunch break, so it occurs to me that either your
5 witness could do about half and then we could take a
6 break, or we can just take a short break now.

7 MR. SUAZO: He's going to be a lengthy
8 witness, so I think if you want to take a break now,
9 that makes sense.

10 HEARING OFFICER ORTH: Okay. Let's just
11 take 10 minutes now.

12 (Recess held from 2:00 to 2:10 p.m.)

13 HEARING OFFICER ORTH: Mr. Arthur, would you
14 spell your first and last name for the transcript,
15 please.

16 THE WITNESS: Oh, am I here now? Can you
17 hear me?

18 HEARING OFFICER ORTH: And do swear or
19 affirm to tell the truth?

20 THE WITNESS: I do.

21 HEARING OFFICER ORTH: Thank you.

22 Mr. Suazo.

23 MR. SUAZO: Thank you, Madam Hearing
24 Officer.

25

1 DAN ARTHUR,
2 having first been duly sworn, testified as follows:

3 DIRECT EXAMINATION

4 BY MR. SUAZO:

5 Q. Mr. Arthur, good afternoon. How are you
6 today?

7 A. Doing good.

8 Q. You know, it might amuse you to know that
9 when I was reviewing your slides, my three-year-old
10 walked in and jumped on my lap and thought I was
11 looking at the ABCs.

12 A. Okay, maybe.

13 Q. So, Mr. Arthur, thank you for being here
14 today. If you can please -- let's go to slide 2.
15 We're going to start with your direct testimony and we
16 want to talk to you about your role and your purpose
17 in this proceeding.

18 Can you please state your name and your
19 role in this rulemaking.

20 A. My name is Dan Arthur. I'm the lead witness
21 for NMOGA. And my purpose here really is giving an
22 overview of NMOGA's position for this and also to
23 really kind of set some ground basis for the other
24 experts.

25 For myself, I am the lead technical

1 expert. I have testified on more than 2,500 dockets
2 across the country, more than a hundred different
3 litigation cases from federal, state, county,
4 et cetera, and including the rule for the -- in front
5 of the Commission.

6 I'm a registered professional engineer
7 in 36 states including the state of New Mexico,
8 registered professional petroleum engineer, certified
9 petroleum geologist, a bunch of other stuff. I used
10 to work for the U.S. EPA. I was an expert with EPA in
11 the UIC program. I've done lots of different things
12 that the slides go over here.

13 MR. SUAZO: We won't spend time on all of
14 the slides, but just for the Commission's knowledge,
15 he has an extensive background. And I want
16 Mr. Arthur to really focus on kind of the scope of
17 his testimony.

18 Let's go to slide 8.

19 BY MR. SUAZO:

20 Q. So, Mr. Arthur, did you file direct
21 testimony in this case?

22 A. Yes, I did.

23 Q. What was the scope of your direct testimony?

24 A. It really comes down to seven general issues
25 here. One is the new definition of beneficial

1 purposes or beneficial use and related proposed
2 presumptions of no beneficial use.

3 Changes to when wells are to be either
4 temporarily or permanently plugged and abandoned.

5 Amendments to New Mexico's existing
6 temporarily abandonment program.

7 New definitions of marginal well.

8 The increased \$150,000 individual
9 financial assurance requirements.

10 Removal of the blanket alternatives, and
11 other financial assurance changes.

12 Changes to waste prevention
13 requirements.

14 And new requirements for operator
15 registration and change of operator, essentially.

16 Q. Thank you, Mr. Arthur. And I'd like to
17 start, at the outset, with your conclusions in this
18 proceeding. And then we can get into kind of the
19 justifications and rationale behind those conclusions.

20 Can you please share with the Commission
21 the conclusions that you reached and what you reported
22 at the end of your direct testimony?

23 A. Yes, sir. And I'll apologize up front. We
24 have a number of things to go to. These conclusions
25 are very high level, but as I think a good

1 introductory, the applicant's proposals are, in my
2 opinion, and this is 45-plus years of experience, are
3 overly rigid, operationally impractical, and
4 economically disruptive.

5 The proposals discredit the value of and
6 disproportionately impact marginal wells. A
7 risk-based financial assurance regimes that reflect
8 factors such as well-depth compliance, history,
9 condition of the well, all that are really a better
10 balance and make more economic sense and stability.

11 The Commission can ensure that its rules
12 remain both enforceable and align with technical and
13 economic realities of modern oil and gas development
14 in the state, you know, preserving the regulatory
15 discretion that it currently has, maintaining the
16 five-year term of temporarily abandonment and other
17 things.

18 Q. Thank you. Let's move on to the subject of
19 waste, slide 10. What are your overarching concerns
20 with the proposed amendments and additions proposed by
21 applicants and supported by OCD with respect to waste?

22 A. I have dealt with this issue many times over
23 the last several decades and worked with many of the
24 state oil and gas directors and companies and just the
25 concern with waste and premature plugging of viable

1 wells that once plugged are lost forever, when
2 technology to utilize these wells exists. And there's
3 so many examples of wells going on for many years.

4 The applicant's proposal will either
5 directly or indirectly result in premature plugging of
6 otherwise potentially economic wells and units, and
7 it's significantly here -- in my opinion, it's the
8 State of New Mexico's responsibility to protect and
9 effectively use its natural resources.

10 Premature plugging could mean that those
11 resources are lost forever, similar to what Oxy talked
12 about. Had they plugged those wells that EOR project
13 may never have occurred.

14 Q. Thank you, Mr. Arthur. Let's move on to
15 slide 11, which goes over the new definition of
16 beneficial purposes and use and the related
17 presumptions of no beneficial use.

18 A. You want to go to the next --

19 Q. Yes, slide 12, please. So let's start with
20 the applicant's proposal to define beneficial use or
21 beneficial purpose and create a separate presumption
22 of no beneficial use provision.

23 What would applicants define beneficial
24 use or purpose as?

25 A. So this one is very concerning to me, but

1 beneficial use is an oil or gas well that is being
2 used in a productive or beneficial manner, such as
3 production injection or monitoring, and does not
4 include the use of wells for speculative purposes.

5 And this is tough for me as a petroleum
6 engineer. As a petroleum engineer, I'm the only
7 engineer there is that never gets to see what I built.
8 I don't get to see a building, a bridge, a road, a
9 street, any of that. We have to use the data that we
10 have to think about how things are underground.

11 And when I look at beneficial, I've done
12 work, including working with OCD, BLM, others, on best
13 management practices, beneficial use of produced water
14 and so forth, that idea of what beneficial is, is
15 tough.

16 And then speculative purposes, you know,
17 this is the oil and gas industry, we do all that we
18 can, but we still speculate, not using some silly
19 dictionary definition that was proposed by earlier
20 witnesses. But we do the best that we can and we
21 speculate. If we didn't speculate, we'd never have a
22 dry hole, right? I mean, it's just, we're trying
23 here. And this isn't waving our arms. This is the
24 industry doing everything it can. So that term
25 speculative really bothers me.

1 Q. Thank you. Let's move on to the next slide
2 to continue with this issue. Can you tell us what's
3 reflected on this slide?

4 A. So, New Mexico has historically extended
5 beneficial use beyond volume-based thresholds or
6 narrowly defined productive activities. And
7 historically, OCD has recognized the various variety
8 of beneficial uses, you know, using on-lease fuel,
9 equipment power, et cetera.

10 But many of these functions are
11 essential to field development and compliance and are
12 not speculative, even though they might seem
13 speculative.

14 Inclusion of the term speculative as a
15 disqualifying factor, without definition, introduces
16 so much subjectivity and regulatory uncertainty and so
17 forth. It's just very much of an issue and risk of
18 introducing duplicative standards. It is just tough
19 with enforcement and many things.

20 Q. Thanks for that background and insight,
21 Mr. Arthur. Let's move on to slide 14. Can you
22 explain to the Commission your recommendation on
23 beneficial use?

24 A. Well, I would say do not define beneficial
25 use, otherwise reject the exclusion speculative

1 purposes from any adopted definition. So adopting the
2 proposed definition would likely result in
3 misclassification of viable wells and, in my opinion,
4 increased plugging obligations, associated loss of
5 production and tax revenue.

6 I recommend rejecting adding the new
7 defined term of beneficial purposes and beneficial
8 use. You know, in the event the Commission proceeds
9 with this, I would totally reject the speculative
10 language.

11 And we have another expert that's coming
12 in later that will be talking a little bit about some
13 options for the Commission to consider.

14 Q. Very good. Let's move on to slide 15, which
15 is the related new presumption of no beneficial use.
16 Can you walk the Commission through your understanding
17 of that proposal?

18 A. This criteria really just, you know,
19 presumes that a production well is not capable of
20 beneficial use if triggered during any consecutive
21 12-month period where, you know, less than 90 days of
22 production, less than 90 BOE and a similar one for
23 injection wells.

24 There's an exemption, you know, period
25 for wells drilled and completed, but the procedure

1 that makes presumption rebuttal, this is tough.

2 Q. Let's move on to slide 16. This sets forth
3 for the sole application process to refute the
4 preliminary determination.

5 How would this presumption work
6 procedurally, and does it create a reasonable and
7 meaningful way for operators to rebut that
8 presumption, in your view?

9 A. So, you know, in this, you know, a well not
10 being used for beneficial purposes would have 30 days
11 to apply for administrative review. Thirty days is
12 tight for any operator, not to mention the Division
13 looking at this, but application for PD review and
14 required to include operational and financial
15 documentation, you know, forecast demonstration,
16 current or future production, a lot of information
17 that takes time to get that is -- that may not even
18 consider all the things that should be.

19 Q. All right. Let's move on to the next slide.
20 What are your recommendations with respect to the
21 proposed presumption of the no beneficial use
22 provision?

23 A. So I would say to wholly reject the rigid
24 90-day criteria. And, again, as I noted earlier, you
25 know, keeping flexibility and so forth is good.

1 If the presumption must be adopted, you
2 know, extending it to 12 months, three years, five
3 years. Five years would be aligned with the maximum
4 EPA approval period, and that would make more sense to
5 me.

6 If the presumption must be adopted, I
7 would make sure that we account for documented
8 infrastructure plans and delays. You know, we had
9 discussions about, like, you know, why did it take
10 eight years, and you think you're completely redoing
11 an entire oil field with water infrastructure, and all
12 these pumps and equipment and so forth and permitting.
13 It's a lot. Projected use with defined field
14 development plans, monitoring data, a lot of different
15 things that just don't happen overnight.

16 Q. And I'm glad you brought that up,
17 Mr. Arthur, because I think the next slide deals with
18 the risks and potential impact of ignoring how wells
19 can be used strategically.

20 What are the risks and potential impacts
21 of ignoring the strategic use of wells within the
22 industry?

23 A. So some of the risks that I see is that this
24 90-day criteria, it's going to disproportionately
25 impact smaller operators. They're not going to be

1 able to move as fast. We work with a lot of small
2 operators, and it takes time.

3 It's going to discourage incremental
4 development, possible loss of leasehold rights or
5 disruption of unit agreements. And it's going to
6 promote premature plugging of viable wells, which,
7 again, is a waste.

8 But using the 90-day criteria to
9 determine whether a well is capable of beneficial use
10 ignores operational value and nonproductive but
11 regulatory infrastructure-related functions; you know,
12 leasehold maintenance, reservoir management,
13 environmental compliance. There's a lot of different
14 things that operators and the OCD need to consider
15 here.

16 Q. Let's move on to slide 19, which discusses
17 the risks and potential impact of time beneficial use
18 for production.

19 What are the risks and potential impact
20 of time beneficial use solely to well production?

21 A. So, production can vary due to market,
22 seasonal, infrastructure factors, like pipeline
23 take-away capacity, gas plant downtime. I'm dealing
24 with a project right now where a gas plant shut down.
25 150 wells or shut in; wells awaiting re-completion,

1 refracs, reactivation, artificial lift systems. I
2 mean, it's like you want an engine right now, with all
3 the AI stuff going on, it takes forever.

4 I mean, a well's capacity for beneficial
5 use to production volumes is short-sighted and doesn't
6 account for the complexities of the oil and gas
7 industry and operators; particularly with marginal
8 wells and shared infrastructure.

9 Q. And importantly, is it your understanding
10 that if this 90-day criteria is triggered, the
11 presumption results in a preliminary determination,
12 which, if not refuted, becomes a determination that a
13 well is not capable of beneficial use, correct?

14 A. That is my understanding. I'm not an
15 attorney, but that's my understanding.

16 Q. Fair enough.

17 Let's move to slide 20, which deals with
18 the proposal to change when wells are to be properly
19 P&A'd. And this is in 19.15.25.8 NMAC, which sets
20 forth when plugging and abandonment obligations are
21 triggered.

22 And on the next slide, slide 21, can you
23 please walk us through the current framework for when
24 a well must be either temporarily abandoned or
25 permanently plugged?

1 A. So, the applicant has proposed shortening
2 the action deadline from 90 days to 30 days, modifying
3 the requirements to place wells in approved
4 temporarily abandonment within the compliance window
5 instead of requiring the operator to apply to do so
6 within the new 30-day time frame. And they strike the
7 work "continuously" from the definition.

8 Q. And is it your understanding that a
9 determination of no beneficial use is one of only
10 three triggering events that create a legal obligation
11 to P&A a well?

12 A. Again, I'm not an attorney, but that's my
13 understanding.

14 Q. Let's move on to slide 22. What are your
15 concerns with changes proposed to when wells are to be
16 temporarily or permanently abandoned?

17 A. So, I plugged a lot of wells and work in
18 that space very actively now. But the changes are
19 contrary to actual timelines for plugging abandonment.

20 Typically, once a decision is made, it
21 may take from 6 to 18 months to get a well plugged,
22 from internal review, cost estimating, contractor
23 mobilization, permitting, scheduling. And a lot of
24 that's going to depend on the depths of the well, site
25 conditions, access.

1 Timelines can even extend further, just
2 like we had the example of the OWL in the wellhead
3 earlier. But surface access issues, other things.
4 These timeframes can represent minimums. You know,
5 often there's other requirements, you know, weather,
6 wildlife, floods, fires. I mean, all sorts of
7 different things.

8 Q. Thanks, Mr. Arthur. Let's move on to slide
9 23. Did you submit direct testimony on the
10 applicant's proposed changes to New Mexico's existing
11 temporary abandonment program --

12 A. I did.

13 Q. -- Under 19.15.25?

14 A. I did.

15 Q. And would you like to adopt that here
16 verbally?

17 A. Yes.

18 Q. Let's move on to slide 24. Can you briefly
19 just walk us through what's on this slide with
20 approved temporary abandonment?

21 A. This is, again, just -- you know, the
22 changes require operators to justify a well's future
23 use to obtain approval from OCD. It imposes excessive
24 and burdensome documentation requests as part of that
25 process, and limits the ATA status extensions beyond

1 the initial approval period of two years.

2 Q. And next slide, slide 25, which deals with
3 the 25.13 pertaining to demonstrating mechanical
4 integrity, can you please talk to us a little bit
5 about that?

6 A. So, this is significant because it changes
7 what was once a notice to now a request and requires
8 cross-references and demonstration operator that the
9 well will be used for beneficial use and approved TA.
10 It increases casing requirements.

11 Q. Okay. And next slide, slide 26, which also
12 deals with mechanical integrity. Can you please
13 explain the significance of this slide?

14 A. But I apologize, I'm trying to go quickly
15 and at a high level here just to run through these.
16 But again, what was once a notice is now a request,
17 requires cross-reference, a demonstration of the
18 operator that the well be used for beneficial use with
19 approved TA status and so forth.

20 Q. Okay. And I think, you know, moving on to
21 slide 27, 28, I think that, you know, what you're
22 trying to say here is that these definitional changes
23 were characterized as clarifications. But do you
24 consider these changes to be mere clarifications?

25 A. I do not.

1 Q. Can you please walk us through that,
2 starting with slide 28?

3 A. So, this is adding a new single definition
4 for expired temporary abandonment and expired
5 temporarily abandonment status as proposed here. And
6 I think I go through more detail on the next slide.

7 Q. Okay. Let's move to the next slide. So you
8 submitted direct testimony regarding the proposal to
9 add a definition of beneficial use or purposes and the
10 related presumptions.

11 What other definitions and related
12 proposals will promote waste and will result in
13 premature plugging, into your view?

14 A. This definition proposal of adding a new
15 definition for marginal wells and increase their
16 financial assurance obligations.

17 Q. And moving on to slide 30, what is the
18 proposed definition of marginal well?

19 A. That an oil and gas oil that produces less
20 than 180 days and less than 1,000 barrel oil
21 equivalent a year within a particular -- within a
22 consecutive 12-month period would be considered
23 marginal.

24 Q. Have you heard testimony in this proceeding
25 proposing to lower that amount from 1,000 to 750 or

1 maybe even lower?

2 A. I haven't been on all the -- watching
3 everything, but that's my understanding based on
4 reading some of the stuff that has -- reading the
5 testimony, that that may be a consideration.

6 Q. And was that what was proposed in the LFC
7 report, do you recall? Would you believe it if --

8 A. Yes, I think it is. I think it is. I'm
9 hesitant of saying absolutely without seeing that
10 right here in front of me.

11 Q. Would lowering that volume amount make more
12 sense than 1,000 BOE?

13 A. It would make more sense. But, again, I
14 truly feel that putting these specific days and
15 volumes to specifically say what a marginal well is --
16 across the board, it's a little tough.

17 Q. Okay. And let's move on to slide 31. What
18 are your recommendations and concerns with the
19 definition of marginal well that applicants propose?

20 A. Based on my experience, it should not be
21 defined. But if it is, it must be grounded in an
22 operational economic context, considering leasehold
23 strategy, reservoir management needs, cash flow
24 projections, not just abstract thresholds.

25 And if it must be defined, then the

1 definition should incorporate flexibility to allow for
2 case-by-case economic assessments, as is done in ATA
3 and other areas.

4 Q. Into other states' --

5 A. Yes --

6 Q. -- marginal issues that better align with
7 regulatory realities?

8 A. Yes.

9 Q. Let's move on to slide 32. What would the
10 definition of a marginal well be used for and what are
11 the proposals by applicants in your view that are
12 implicated here through this definition?

13 A. So this deals with a revised financial
14 assurance of \$150,000 for each marginal well prior to
15 transfer and more. But this gets down to the per-well
16 financial assurance issue.

17 Q. And would raising these financial assurance
18 amounts impact asset transfers and changes of
19 operators?

20 A. Absolutely.

21 Q. Can you explain why?

22 A. So when you have this one tracking it, and
23 the things that are in here are tough, but assuring
24 that that's done, assuring that everything is there,
25 this can become a challenge.

1 Q. Let's move on to slide 33, still dealing on
2 with marginal wells. What is a marginal well
3 producing in terms of volume and value, and why are
4 they important to New Mexico?

5 A. I will say that marginally producing wells
6 in New Mexico collectively contribute a meaningful
7 share of the national production. Marginally
8 producing wells represent significant portions of
9 New Mexico's oil and gas portfolio. Huge losses,
10 financial losses and repercussions, including lost tax
11 revenue, could result if this is moved forward with.

12 And I will also note, this is
13 significant, I think, is marginally producing is not
14 necessarily synonymous with end of life. I know wells
15 that have been producing over 100 years.

16 Q. And I think that brings us to, you know,
17 comparison to some other states and whether or not
18 they define marginal wells. And it's my understanding
19 that not all jurisdictions choose to define marginal
20 well; is that correct?

21 A. That is correct.

22 Q. How do applicant's proposed definition of
23 marginal wells compare to other jurisdictions that did
24 elect to define the term?

25 A. So this is -- you know, you have the table

1 here, but, like, if you look at North Dakota, they,
2 they have a couple of different definitions.

3 One, less than ten barrels a day for
4 wells, you know, under 6,000 feet in depth; less than
5 35 barrels a day for deep wells in the Bakken or the
6 Three Forks.

7 And North Dakota is a little different
8 because, you know, the first oil well wasn't drilled
9 in North Dakota till 1956. And, you know, you had the
10 Bakken come in later and the Three Forks. So you
11 have, like, kind of really two categories of wells in
12 the whole state.

13 And now, it's very different than
14 New Mexico with the San Juan and coal, methane, all of
15 these other things.

16 But there's other ones per state that
17 have looked at this and tried to provide a broader
18 category.

19 Q. So in your view, are there risks or impacts
20 inherent in adopting a rigid definition of marginal
21 well as proposed by applicants?

22 A. That's my opinion.

23 Q. So, based upon all that you've touched on
24 with respect to marginal wells, can you please provide
25 the Commission with your concerns with adding a

1 definition of marginal wells in New Mexico?

2 A. So, as noted on the slide, the risk of
3 premature plugging in marginal wells yet viable, it
4 just gets amplified by these financial assurance
5 proposals.

6 So if you look at this on an overall
7 basis, there are serious cost implications for the
8 State of New Mexico and operators alike. If you look
9 at, you know, some of the numbers here and, you know,
10 what percentage of the wells and what they've
11 contributed for marginal wells in the state of
12 New Mexico.

13 And then if you look at just FY 2024,
14 industry contributed 49 percent, about \$7.4 billion,
15 into the State of New Mexico general fund.

16 And if you look at the production, you
17 know, of the marginal well portion of that, it's not
18 insignificant. This is, you know, over a billion
19 dollars.

20 Q. Let's move on to slide 37, because I'd like
21 for you to discuss for the Commission the proposals to
22 increase financial assurance requirements for marginal
23 wells. Next slide. And let's start with slide 38?

24 A. So, this, I'd say of significance here, is
25 the \$150,000 per well bond and what essentially

1 ultimately gets rid of the blanket bond approach. But
2 it provides essentially a stacked financial assurance
3 program for marginal wells.

4 Q. Let's move on to the proposed financial
5 assurance increases for active wells. What are those
6 proposals?

7 A. So the current financial assurance
8 requirements for active wells are risk-based, which, I
9 think, you know, the OCD, the OCC, states in general
10 didn't do that for no reason.

11 So right now, starting at \$25,000 plus
12 an amount determined by depth and offered tier blanket
13 bonding alternatives of \$250,000 is only required to
14 secure 100-plus active wells.

15 The proposed increases for active wells
16 financial assurance requirements of \$150,000 per well
17 or \$250,000 blanket bond alternative. So the scope of
18 active wells financial assurance requirements change
19 because applicant's proposal would add new marginal
20 well requirements, expand inactive requirements to the
21 scope, and add new grounds to inactive to align with
22 the proposed definition of beneficial.

23 So if you start looking at this -- and
24 we've heard a lot of testimony over the last few days
25 about it, but in my opinion, it's unworkable and will

1 unnecessarily exponentially increase the bonding
2 requirements for wells which post the least risk that
3 are most prevalent in New Mexico and will drive
4 business and tax revenue out of the state, absolutely.

5 Q. All right. Now let's move on to the current
6 financial assurance requirements for inactive wells.
7 Can you briefly walk us through that on slide 40?

8 A. So this shows in red what's proposed, but,
9 you know, inactive wells and wells in approved and
10 expired temporarily abandoned status and so forth.
11 But this comes back to the \$150,000 per well and
12 blanket plugging financial assurance equal to an
13 average of \$150,000 per well.

14 Q. And then for the next class of wells, which
15 are active wells, how do applicants propose amending
16 those financial requirements? Slide 41.

17 A. Currently, financial assurance for inactive
18 wells or risk-based. We talked a little bit about
19 that. But proposed financial assurance for inactive
20 wells and wells in temporarily abandonment status
21 would be \$150,000, with no true blanket bond
22 alternative.

23 So \$150,000 well, average blanket bond
24 creates a moving target, really, when you look at what
25 wells are being done, especially over time, which in

1 turn creates internal compliance risk.

2 So just like the active well proposals,
3 the inactive well financial assurance requirements
4 are, in my opinion, unworkable, unnecessarily
5 exponentially increase the bonding requirements for
6 wells, which NMOGA P&A expert is going to talk about
7 here a little bit later. But it'll also certainly
8 drive business out of the state.

9 Q. Let's move on to slide 42. What is the
10 expanded scope of inactive wells that are subject to
11 heightened bonding requirements under applicants
12 proposal?

13 A. So this shows the existing and proposed
14 language, which I won't read, but it could effectively
15 also be expanded to any well which has had no
16 production or injection for 12 consecutive months
17 because OCD's separately proposals to modify the
18 definition of inactive well by adding those new
19 grounds to align with proposed new definition of
20 beneficial.

21 Q. And moving on to slide 43, dealing with
22 proposed financial assurance increases for marginal
23 wells, and they're tied to the inactive territory,
24 what are the new requirements and what are your
25 concerns with this proposal from applicants?

1 A. So the new \$150,000 financial assurance
2 requirements for all individually secured marginal
3 wells would start in 2028. If the new less than
4 15 percent threshold, which is very small for marginal
5 or inactive wells portfolios, beginning at \$150,000
6 requirement applies to every well registered to the
7 operator, regardless of active, marginal and inactive,
8 inclusion of these requirements will exponentially
9 increase bonding.

10 In rulemaking, this rigid, unrealistic
11 threshold set by definition, and keeping in mind the
12 prevalence of marginal wells in New Mexico, will have
13 a devastating impact.

14 Q. All right. And moving to slide 45, can you
15 please walk us through your concerns with this
16 proposed change to 19.15.8.9A?

17 A. So, this gets into the -- you know, the note
18 here addition is, you know, the operator should not
19 proceed with any proposed drilling or acquisition
20 until the operator has furnished the required
21 financial assurance.

22 And, again, this is just very difficult,
23 and imagine an operator having a number of wells and
24 trying to manage all this and OCD and trying to manage
25 them managing it and so forth. This is unworkable.

1 Q. And is it unworkable from, like, a timing
2 perspective? Can you help us understand why it's
3 problematic?

4 A. I think it's from a -- what you're going to
5 require through this and many other changes is you're
6 going to have to have more staff at oil and gas
7 companies, more staff at the OCD trying to manage what
8 stuff is going on.

9 Because that's the other thing that
10 doesn't happen, is wells aren't typically just a
11 static thing. We're trying to do different things
12 with them, consider them for different things and so
13 forth.

14 Q. Thank you. Let's move on to slide 46, which
15 are other proposed financial assurance changes to
16 19.15.8.9F. How do applicants propose to change the
17 incomplete blanket financial assurance requirements?

18 A. So this one gets a little bit more
19 complicated for me, and we're going to have another
20 expert that's going to -- you know, a surety expert
21 that's going to talk about this. But this gets down
22 to the consumer price index and updating things as we
23 go along to essentially increase that bonding level.

24 Q. And moving on to slide 47 concerning
25 incomplete financial assurance, what are your concerns

1 with these proposed changes?

2 A. So the proposal would require operators with
3 incomplete blanket financial assurance requirements to
4 provide an additional \$150,000 single-well financial
5 assurance for uncovered wells and remove the blanket
6 option.

7 This is unworkable to mandate matching
8 new wells with bonding coverage without accounting for
9 acquisitions and issues updating bonds.

10 This is another instance of the
11 applicants eliminating blanket bond alternatives,
12 which we'll have another expert talking more detail
13 about, but this is concerning.

14 Q. Okay. So overall it sounds like there's an
15 overarching concern with a one-size-fits-all approach.
16 You discussed the \$150,000 individual financial
17 assurance. Can you explain why this is problematic
18 compared to a risk-based alternative?

19 A. So, keep in mind that, you know, as we've
20 had witnesses talk about the \$150,000 looking at data
21 from the OCD, but again, you know, as has also been
22 testified, that industry plugs, you know, 95 percent
23 of the wells. And the current costs seem to be based
24 off of extreme plugging wells, extremely high ones
25 that aren't typical things.

1 And when you look at this, you know,
2 well plugging may cost \$20,000 or less for some wells.
3 And even for longer horizontal wells, you typically
4 don't plug the horizontal section. And moreover, an
5 operator doing this, we just plug two wells that were
6 unconventional horizontal wells in the Texas Permian,
7 just across the border, and by the time we sold the
8 tubing, cut the casing, sold that, we're able to plug
9 both those two wells for \$4,000.

10 So, there will always be exceptions.
11 But, you know, I think that there's a better, more
12 tailored way to look at this, as opposed to this hard
13 and fast \$150,000 based on, you know, a few examples.

14 Q. So, you brought up some other examples in
15 other jurisdictions on slide 49. Can you walk the
16 Commission through how the proposed financial
17 assurance changes compared to some other
18 jurisdictions?

19 A. So, again, these are, you know, some, you
20 know, other states, Utah, North Dakota, Colorado. But
21 you know, Texas, it's right across the border over
22 here. So, you know, the railroad Commission maintains
23 a pure blanket bonding schedule, you know, \$25,000 for
24 less than 10 wells, \$50,000 for 11 to 100, \$250,000
25 for more than 100. You know, but, you know, these are

1 things that are not similar to what New Mexico has
2 now. But it varies, you know, kind of by state; all
3 the states aren't the same. They've chosen to do
4 things a little different, but they're also all
5 different.

6 Q. Let's move on to the next slide, which
7 discusses the risks and potential impacts that could
8 occur if these changes are adopted. Can you walk us
9 through your concerns on that slide?

10 A. Sure. There's certainly direct operational
11 impacts of heightened financial assurance requirements
12 on this per-well basis. You know, it's going to be
13 repeated revisions to bonding instruments, which is
14 going to be an ongoing thing, legal review of
15 acquisition documents for bonding, delays in closing
16 deals, higher overhead, and so forth.

17 But it will likely require expanded
18 internal compliance staffing, as I noted earlier. And
19 other unintended consequences, I think, that are going
20 to flow from this, is reduce access to capital for
21 small and mid-size operators, discourage participation
22 from asset acquisition or farming agreements,
23 premature plugging. But even from the small
24 operators, you're going to have large operators that
25 aren't going to be able to take assets and provide

1 them to maybe a smaller operator with lower overhead
2 that could really turn those assets into something
3 great.

4 Q. And you've experienced changes like this and
5 their impacts in other jurisdictions. Can you please,
6 on slide 51, walk the Commission through some of the
7 negative effects that have been experienced by other
8 states as a result of changes such as this?

9 A. Well, certainly the three that I show here,
10 you know, in California, you know, implemented bonding
11 reforms in, you know, '19 -- or 2020, 2022, led to
12 significant higher bonding obligations per well,
13 triggered delay of permit approvals, transactions,
14 contributed to early abandonment of marginal wells and
15 ultimately a lot of business leaving California.

16 Alaska attempted the per-well bonding
17 increase in 2019. It was ultimately scaled back after
18 industry opposition and concerns about insolvency and
19 stranded assets. I talked to them extensively about
20 this.

21 Colorado did the same thing, and it's,
22 you know, led to operator consolidation, divestment of
23 marginal assets, increased bonding disputes and, and
24 frankly, a lot of operators and companies that just
25 refuse to do business in Colorado now.

1 Q. Now, we told the Commission we're going to
2 provide some recommendations throughout your
3 testimony. On slide 52, can you please walk the
4 Commission through your recommendations?

5 A. Sure. And these, again, we're limited on
6 time, so these are very high level recommendations,
7 but these far-reaching, expansive negative impacts
8 greatly outweigh the incremental benefit the new
9 requirements would provide. In my opinion, they're
10 completely unnecessary, considering the level of
11 financial assurance already provided.

12 New Mexico's current financial assurance
13 requirements, you know, as will be explained, you
14 know, here later, so they'll go into some of the
15 details, other experts from the NMOGA. But we also
16 have the state's reclamation fund and places a
17 backstop, in addition to existing financial assurance,
18 as well as the state's existing TA program, which is
19 going to be talked again.

20 But alternatively, I would suggest
21 engaging stakeholders in technical discussions about
22 the relative risks associated with plugging and
23 abandoning a variety of wells, and to better inform a
24 bigger well instead of this one size fits all on.

25 And that's one of the things I really

1 saw about this, is we tend to be lumping things in
2 these very, very general categories, you know, this
3 number, without considering where the well is, the age
4 of the well, you know, what the potential is, and so
5 forth, and what the new potential technologies and
6 available things are for wells to be of beneficial use
7 today.

8 Q. Thanks, Mr. Arthur. Can you, moving on to
9 slide 53, also go over for the Commission your
10 conclusions for the financial assurance proposal
11 portion this rulemaking?

12 A. So hopefully my testimony is providing a
13 little context for, you know, Mr. Emerick's
14 forthcoming testimony.

15 I've examined other states' financial
16 assurances, you know, and I find WELC's proposal would
17 be unnecessarily rigid and just doesn't incorporate a
18 risk-based framework, which is critical.

19 So for me and based on my experience,
20 the proposed framework fails to reflect operational
21 cost variability of well plugging. In my experience,
22 a one size fits all just doesn't work. Some wells can
23 be plugged very cheaply and not for this huge number
24 that's been provided, and that shouldn't just be
25 proposed across the board.

1 They don't account for the fact that
2 vertical well sections or horizontal wells don't
3 necessarily need to be plugged. This proportionally
4 impacts smaller operators, which I hate. I love small
5 business. I have a small business. And it poses
6 barriers to routine transactions and transferring
7 operators to post excessive bonding amounts and
8 triggering -- you know, by triggering blanket bond
9 requirements based on margin well percentage that
10 don't correspond with actual risk.

11 Q. All right. So let's move on to the next
12 issues we want the Commission to consider through your
13 testimony.

14 Slide 54, let's discuss the proposed
15 changes to the waste prevention requirements under
16 19.15.5.9A and how they will affect financial
17 assurance determinations if adopted as proposed by
18 applicants.

19 And maybe if you could start, you know,
20 with what the waste prevention requirements are
21 presently, that'd be helpful. And then we can move on
22 to the next slide.

23 A. So from a very basic perspective of where we
24 are now, it's the state's responsibility, just as it
25 is with every oil and gas producing state, to manage

1 those resources responsibly and not let them go. I
2 mean, that's -- you know, if you can.

3 And what's been proposed, it removes the
4 compliance buffer for small operators and minor
5 deviations and adds regulatory cross-references to
6 other things like flaring and P&A that there's a lot
7 of things that happen in the oil industry that aren't
8 necessarily, you know, meant to be bad or violations
9 or whatever. So they're trying to manage those
10 properties.

11 Q. Okay. And on the next slide, what are your
12 major concerns regarding this proposed change?

13 A. So really, you know, the removal of the two
14 to ten well compliance buffer for smaller operators
15 and minor deviations make it just impractical and
16 unrealistic. I've been the EHS director on a contract
17 basis for probably 30 different oil and gas companies,
18 and managing compliance can be a challenge, and
19 sometimes it's very, very minor things that come up.

20 But it creates likely risk of good faith
21 spending. Flaring, technical issues will be treated
22 like just non-compliance when they could be just not
23 significant and something that could be addressed very
24 quickly.

25 Adding cross-references enables OCD to

1 leverage those separate and distinct requirements for
2 other uses not intended when reference rules were
3 promulgated and unfairly penalizes compliant operators
4 if they acquire non-compliant entities. And I've done
5 a lot of stuff where I've helped companies that have
6 bought assets that did have non-compliance, and we
7 spent time getting those assets back into compliance.

8 Q. So, just so I understand, based on what you
9 said, the rule is already in the existing regulations.
10 There's no need to cross-reference it for these
11 purposes?

12 A. Right.

13 Q. Let's move on to slide 57. So what are your
14 recommendations for the Commission with respect to
15 applicant's proposal to amend the waste prevention
16 requirements?

17 A. I truly believe that they should be
18 rejected. But, at the very least, removal of the two
19 to ten well compliance buffer should not be touched.
20 And the cross-references in the proposal with the
21 precise requirements do that and have a grace period.

22 Q. Let's move on to slide 58, which deals with
23 19.15.9, the well operator provisions. Can you give
24 the Commission a brief summary of the changes that
25 applicants propose to OCD's operator registration

1 requirements?

2 And we can move on to the next slide as
3 part of that?

4 A. This gets into the issue of, you know, any
5 operator -- person within an operating company that,
6 you know, was more than 25 percent owner that had
7 non-compliance or was with a company in non-compliance
8 would be a problem and be impacted.

9 Q. Okay. Next slide. Do you mean the change
10 of operator?

11 A. Yeah. This is a similar sort of thing on
12 the change of operator that, you know, that person
13 with 25 percent interest. So that's the, I would say,
14 crux of this.

15 Q. Thank you. And then the final slide, before
16 we get into the questions, can you please explain
17 slide 61?

18 A. So adding this additional disclosure and
19 certification requirements to operator and change of
20 operator, affirmative certification compliance with
21 all federal and state laws in each state that an
22 operator does business, which NMOGA and IPANM have
23 jointly challenged. NMOGA's expert will talk about --
24 the legal expert will talk about that.

25 But mandatory disclosure of whether any

1 current or past officer or owners with more than
2 25 percent interest were affiliated with non-compliant
3 operators, is this an annual certification? This is
4 tough.

5 Q. Now, from an operational standpoint, let's
6 say you're a larger company and trying to do business
7 in New Mexico and you're required to meet these
8 requirements, even though you operate in many
9 different states. From a practical standpoint, what
10 are some of the challenges that you see?

11 A. Well, any new operator out of compliance
12 with federal, state law, you know, in any state that
13 does business, your know, OCD could deny it, change of
14 operator, if you were trying to move in.

15 But it goes through these different
16 things, and certifications or disclosure, those show
17 substantial risks that the new operator can't meet
18 plugging and abandoning requirements, if that's the
19 case. So this certainly, you know, may vary by size
20 of operator and so forth. But probably be, you know,
21 more specific to small and mid-size operators.

22 But this is tough, because if I own
23 25 percent of an oil company and the company I have is
24 a month late in submitting production reports, that's
25 a violation, that's non-compliance.

1 Q. Okay. Now let's move on to slide 63,
2 dealing with prohibiting transfers of non-compliant
3 wells. What is proposed under subsection E of this
4 proposal?

5 A. It would prohibit the transfer of
6 non-compliant wells or facilities, you know, unless
7 they're brought into compliance or a compliance
8 schedule is approved.

9 Q. Okay. Now, it may seem practical to do
10 that, but what are the risks and potential impacts
11 that you see with this proposal as it's proposed on
12 slide 64?

13 A. So, I'll just say, as I noted earlier, I've
14 done a lot of this, but these requirements are
15 unworkable, if not impossible to meet. The proposal
16 would chill executive and investor mobility by
17 deterring otherwise qualified professionals from
18 serving. Requiring affirmative certification of
19 compliance in all states where an operator does
20 business may seem easy, but it's not.

21 Tracking the historical and ongoing
22 compliance status of entities is cumbersome. This
23 patchwork compliance burden where technical violations
24 in one jurisdiction, you know, such as a delayed
25 report or something, you know, non-material could

1 inadvertently trigger consequences that ultimately
2 could drive business away from the State of New Mexico
3 and worse.

4 Q. All right. So I think we've moved along
5 pretty speedily, giving the detail in your direct
6 testimony.

7 Let's move on to slide 65 and 66 so that
8 you can walk the Commission through your overarching
9 recommendations so that the Commission can consider
10 that in this rulemaking?

11 A. So, I have seven high level recommendations.
12 First is to reject the definition of beneficial use
13 and related presumption of no beneficial purposes or
14 beneficial use.

15 Then to decline to add the rigid
16 definition of marginal wells and new marginal well
17 financial assurance requirements.

18 I'd suggest to maintain regulatory
19 flexibility wherever possible; to preserve the use of
20 blanket bonds and avoid stacking requirements; to
21 reject the use of average per-well blanket bond
22 requirements. Encourage adoption of tiered
23 incentive-based structures. And limiting additional
24 reporting and certification burdens.

25 And as we go through these kind of one

1 by one in a little bit more detail, the Commission
2 should decline to add the new definition of
3 "beneficial," you know, due to the unintended
4 consequence it could have with the Commission's state
5 regulations that utilize the term.

6 If in the event the Commission does move
7 forward, the word "speculative" should be removed at a
8 minimum and preferably non-production related uses
9 identified within the definition.

10 The Commission should also decline to
11 add WELC's proposed presumption of no beneficial use.
12 But in the event that the Commission moves forward, I
13 would say, you know, changing this 90-day to -- or
14 30-day to 90 days, five years, you know, would be
15 better and would align with the ATA.

16 Q. And let's move on to your second
17 recommendation, slide 68, which deals with the
18 definition of marginal wells and the marginal well
19 financial assurance requirements?

20 A. So, I would recommend rejecting WELC's
21 proposal to add a new definition of marginal well. If
22 a definition must be adopted, which in my opinion
23 isn't necessary, then a new marginal well definition
24 and resulting classification must be grounded in an
25 operational and economic context, not abstract

1 thresholds.

2 Applicants proposed definition of
3 marginal well sets thresholds that do not align with
4 reality of how marginal wells operate and their
5 prevalence in New Mexico.

6 It appears the new definition of
7 marginal wells would also trigger the proposed
8 heightened \$150,000 per marginal well financial
9 assurance requirement for every well, where operators
10 have more than 15 percent inactive or marginal wells.

11 I also recommend the \$150,000
12 one-size-fits-all individual well assurance
13 requirements be rejected, and that a risk-based
14 individual well-bonding currently in place be
15 retained.

16 Q. All right. And moving on to your third
17 recommendation, which is to maintain regulatory
18 flexibility, can you walk us through why that's
19 important?

20 A. So using financial assurance as an example,
21 the Commission should preserve the discretion and
22 financial assurance determined by allowing for
23 risk-based bonding levels and approaches to consider
24 operative compliance history maybe, well condition,
25 asset maturity, demonstrated plugging costs, things

1 that actually line up to make those numbers real, as
2 opposed to just a flat number.

3 So that flat per-well bonding
4 requirement, such as \$150,000 per well, fails to
5 reflect actual risk or plugging cost variability, and
6 will unnecessarily burden operators that are with
7 viable, well-producing wells.

8 Q. Okay. And your fourth recommendation,
9 recommending preservation of blanket bonds, can you
10 please --

11 A. So the Commission should affirm that blanket
12 financial assurance satisfies applicable obligations
13 for covered wells, avoid rules that outright or
14 effectively eliminate that option, and avoid rules
15 that require simultaneous, single-well and blanket
16 bonds unless there is demonstrated case-specific basis
17 to require a vote.

18 Q. Okay. And your fifth recommendation to
19 reject the use of average per well, blanket bonds.
20 Can you walk through that?

21 A. O the proposal should require blanket
22 bonding based on -- or should -- the proposal to
23 require blanket bonding based on an average of
24 \$150,000 per well, introduces target compliance
25 standards that are difficult to administrate or audit

1 or enforce.

2 It's going to create confusion and
3 generate unintended consequences for acquisitions,
4 mergers and internal compliance. I really think the
5 Commission should, instead, the fixed blanket bonding
6 tiers that align with industry norms and would
7 simplify enforcement.

8 Q. Your sixth recommendation regarding tiered
9 and incentive-based structures, can you please explain
10 that?

11 A. So, New Mexico could adopt a tiered-based
12 bonding structure that provides reduced financial
13 assurance obligations for operators who maintain, for
14 instance, strong compliance records, reduce inactive
15 well counts, perhaps actively participate in orphan
16 wall reduction efforts.

17 It's already being used in some states.
18 And I agree orphan walls are an issue that we need to
19 address, but, you know, let's look at this in a
20 reasonable manner.

21 Q. And your final direct recommendation
22 limiting additional reporting and certifications, can
23 you please explain that to the Commission?

24 A. So the proposed new registration and
25 ownership certification requirements are overly broad,

1 likely unworkable in practice and risk discouraging
2 executive mobility and capital investment. Any
3 ownership-based disclosure should be limited to
4 current control parties with material decision-making
5 authority and based on known verifiable records.

6 So I know you can -- you know, you can
7 go to state websites or whatever and look to see if
8 somebody has compliance issues or not, but it's not
9 that easy.

10 Q. And that completes your direct testimony.
11 I'd like to move on to the rebuttal testimony with the
12 time we have left, starting with slide 75.

13 Can you please walk us through your
14 overarching concerns with the applicant's application?

15 A. So, one, analysis of what the legislative
16 finance committee report actually states and
17 recommends, as compared to the applicant's
18 characterization, is an issue I have. The applicant's
19 mischaracterized marginal temporarily abandoned and
20 orphan wells as high risk and difficult to manage with
21 no future benefit.

22 And third, the applicant's proposals
23 ignore oil field innovation.

24 Q. Now let's walk through what the legislative
25 finance committee report actually says and recommends.

1 What discrepancies do you see between what the LFC
2 report says versus what the applicant says it says?

3 A. Well, this is what I appreciate when you
4 encourage everyone to read that report from front to
5 back.

6 But the LFC report recommends a lower
7 threshold for low-producing wells. And the applicants
8 proposal under the new definition of marginal well,
9 proposes the report acknowledges the need for
10 flexibility in assessing future potential of wells.
11 It confirms the lack of authority to make marginal
12 well financial assurance category.

13 The report confirms the lack of
14 authority to deny well transfers if determined the
15 buyer is unlikely to fulfill plugging, abandonment and
16 reclamation obligations. The report recommends a
17 narrower definition of orphan wells than applied and
18 recommended by the applicant and agency witnesses.

19 And the LFC report narrowly defines a
20 narrower definition of orphan well undermines
21 applicant's reliance on OCD's master orphan well list,
22 which captures wells beyond those the state has
23 pursued or obtained plugging authority for.

24 Q. Okay. Next slide, dealing with applicant's
25 characterization. How did applicants mischaracterize

1 marginal, temporarily abandoned and orphan wells as
2 high risk and difficult to manage with no future
3 benefit?

4 A. Well, marginal inactive wells tend to be low
5 risk and can be managed without environmental
6 incident. So, temporarily abandoned wells can be
7 easily reactivated and lower risk than active
8 producing wells. They don't have flow pumps,
9 everything going on.

10 Marginal, temporarily abandoned and
11 inactive wells present future benefit beyond
12 production or injection.

13 Q. And on your next slide, you know, oil field
14 innovation?

15 A. So these are just some of the things. You
16 know, we've talked about water flooding and EOR, but
17 CO2 huff-and-puff projects, stimulating existing wells,
18 carbon capture and sequestration, and so much more.

19 Q. Okay. Now let's talk about some of the
20 issues you have with applicant and OCD's position that
21 current financial assurance requirements are
22 inadequate.

23 What other factors do you think were
24 ignored in their testimony, and how can you lay that
25 out for the Commission today?

1 A. If you look at the history and what's
2 happening, I believe blanket bonds function as
3 intended. Industry can plan, abandon, remediate wells
4 faster and cheaper than OCD, undermining applicant's
5 and agency's reliance on LFC averages.

6 And that's not to say that industry is
7 not going to have wells that are going to be super
8 expensive to plug and remediate, too, but this is in
9 general. And OCD often winds up taking the worst of
10 the worst.

11 Operators should not be held to a
12 standard or accountable to the public for cost
13 overruns until OCD's procurement system is remediated.
14 This was noted. You know, and I'd say across the
15 board, even throughout different states, but analysis
16 of reclamation cost claims and existing SLO lease
17 surface improvement damaged bond requirements, you
18 know, we do a lot of these, but if they can vary
19 dramatically.

20 The reclamation fund is ignored, and
21 it's there for a reason. It should be used. Multiple
22 statewide economic and policy consequences will flow
23 from the proposed changes. Financial assurance
24 increases actually create the risk of premature
25 plugging. So this is premature plugging of many wells

1 that are viable and hold value for the state.

2 Q. Okay. And moving on to slide 80 with your
3 recommendations for alternatives the Commission might
4 consider. Can you walk us through some additional
5 financial assurance recommendations for the
6 Commission?

7 A. So it would encourage a phased or risk-based
8 assurance -- phased or risk-based assurance increases,
9 flexibility tied to well risk and operator compliance
10 history. So that was one of the things that I saw
11 really ignored, is, you know, how are we defining the
12 risk of these wells, other than they're not producing
13 or they're marginal.

14 Refining targeted enforcement
15 mechanisms, instead of discarding the tools that they
16 already have. Enhanced reporting or certification for
17 inactive wells only, using reclamation fund as
18 designed.

19 I think there's been bipartisan support
20 has been shown for relying on proven value of reserves
21 and other things. So there's a lot that should be
22 considered here.

23 Q. Let's move on to the plugging and
24 abandonment analysis in your recommendation. What
25 recommendation and responses would you like to leave

1 the Commission with?

2 A. So, just to recognize that shortening
3 compliance windows and converting periods of
4 inactivity into near automatic plugging or formal
5 temporary abandonment filings removes operational
6 flexibility.

7 So when you start, you know, sequence,
8 re-completions, coordinating and gathering,
9 compression, all these different things that can come
10 into play tend to get ignored. And, you know,
11 plugging not tied to actual mechanical or
12 wall-specific risks showing a need to plug undermines,
13 you know, the act and conservation mandates by
14 foreclosing otherwise prudent, near-term reactivation
15 pass and pad level optimization. So, you know, it's
16 going to result in plugging viable wells.

17 Q. Okay. And with respect to approved
18 temporary abandonment and the definitional changes
19 proposed, how would those changes affect P&A, starting
20 with the changes to the approved temporary abandonment
21 definition?

22 A. I would reject OCD's assertion that the
23 proposed definition expansion simply provides clarity.
24 That framing omits practical effect of collapsing
25 distinct concepts into a single defined status

1 tethered to compliance.

2 As written, the definition would allow
3 temporarily abandonment exploration to be equated with
4 broad non-compliance and then cascade into plugging
5 obligations. That's not clarity so much as a
6 definition driven mandate that automatically converts
7 routine compliance lapses into plugging obligations.

8 So where consistency is needed across
9 parts, harmonize reference without importing new
10 outcome determinative labels.

11 Q. Okay. And then on your next slide, you
12 discuss expired temporary abandonment. What about
13 those changes to the expired TA definition?

14 A. Well, OCD, again, suggests that this
15 amendment merely codifies an administrative shorthand.
16 But the phrase "no longer complies" is vague and could
17 encompass anything from minor reporting delays to
18 mechanical integrity questions. So trivial to
19 significant, this would create an automatic
20 reclassification of wells based on incidental or
21 easily correctable issues leading to arbitrary
22 enforcement.

23 And OCD already administrates
24 temporarily abandonment through the code. By tying
25 expiration to broad non-compliance, the definition

1 would function as an overbroad definitional trigger,
2 which it could automatically force premature plugging
3 again on wells that remain mechanically sound and have
4 future development potential.

5 Q. Okay. Now, on your next slide, you have a
6 recommendation with respect to marginal well. Can you
7 walk the Commission through that, please?

8 A. So, again, adding the definition of marginal
9 well, you know, based on my experience, you know, the
10 proposed definition of marginal well would capture
11 production in productive and viable wells and
12 misclassify them. So many wells that fall below the
13 threshold there serve critical operational rules, like
14 lease retention, reservoir management, and so forth,
15 as we've noted.

16 The LFC report recommends that OCC adopt
17 a definition of low-producing wells producing less
18 than 750 BOE annually or about 2 BOE per day. So for
19 these reasons outlined in my direct testimony, the
20 term "marginal" should not be defined due to the
21 unforeseen and widespread consequences that modifying
22 the term might have.

23 But if the definition must be assigned,
24 I believe at least the LFC report's recommendation
25 threshold of low-producing should be adopted if deemed

1 absolutely necessary. And again, I don't think it's
2 necessary.

3 Q. Thank you. We're almost done with your
4 slides. But slide 85 concerning the tying of waste
5 prevention requirements to the beneficial and inactive
6 well list, were there any notes on how the proposals
7 were interconnected and related that you want to
8 highlight for the Commission as it relates to your
9 overarching concerns with waste?

10 A. So the OCD reports that change needed to be
11 consistent with the changes proposed. You know, by
12 tying this directly to the new presumptions of no
13 beneficial use, you know, under 19.15.25.9, OCD is
14 effectively hard-wiring flawed thresholds and
15 procedural determinations into an inactive well
16 framework. The Commission should reject the proposed
17 amendments as drafted.

18 If an inactive well list is to be
19 maintained, wells should be added only after
20 case-by-case evaluation of risk and beneficial use,
21 not automatic consequences of failing arbitrary
22 production or injection levels.

23 At a minimum, the rule should allow
24 operators to demonstrate beneficial use before
25 production volumes and should preserve OCD's

1 discretion.

2 So linking compliance to registration
3 and financial assurance approvals, operators who fall
4 even temporarily out of compliance with plugging or
5 flaring requirements could be barred from registering
6 or transferring wells or from releasing assurance.

7 Faced with such uncertainty, and this is
8 significant when I say uncertainty, many operators
9 will choose to plug wells rather than risk regulatory
10 deadlocks or compliance or enforcement.

11 Q. And that also promotes waste, correct?

12 A. Absolutely.

13 Q. All right. So what other the proposals
14 create the risk of waste via premature plugging,
15 according to slide 86 of your exhibits?

16 A. So, at a high level here, the expanded
17 definition of marginal and inactive wells, the
18 shortened compliance window under 19.15.25, 90 days to
19 30 days after 12 months, elimination of risk-based
20 individual well assurance requirements and blanket
21 bonding alternatives, going to this \$150,000 per well
22 bond, market realities of the surety industry, and
23 we'll have an expert talk about this, but even having
24 that industry do this -- and I'm not, you know, a
25 surety expert, but I've had to get a lot of bonding

1 for a lot of different operators. And then reducing
2 the current 15-month timeframe for a well in
3 inactivity to 13-month inactivity, those are those
4 general things that I'm concerned with.

5 Q. Okay. And the final slide of your rebuttal.
6 What are your closing remarks and conclusions for the
7 Commission, Mr. Arthur?

8 A. And I've been in the regulatory environment
9 since the 1980s. I've developed federal regulations.
10 I've helped states with their regulations in a variety
11 of cases. And, you know, what concerns me when I look
12 at some of this is, the longest producing well in
13 America is in Pennsylvania, you know, if that well was
14 in New Mexico, it would have to get plugged.

15 The first well drilled in Tulsa,
16 Oklahoma, was drilled in 1901. It's still produces
17 today. It's produced over a million barrels of oil,
18 produces about a quarter to half a barrel a day. And
19 they're able to do that because the guy who owns the
20 well, it's on his ranch, he walks out about 100 yards
21 every day and flips the pump on for about an hour.

22 So there's a variety of different things
23 where every operator isn't the same, every operator
24 isn't a shell or Exxon or Oxy. There's a variety of
25 these across the board, and I hope we look at that and

1 do that.

2 And I notice I also have heard multiple
3 times the term "bad actors" use. And I 100 percent
4 agree. I do a lot of expert work for the Securities
5 and Exchange Commission on fraud cases and so forth.
6 So I've worked with the SEC to go after bad actors.
7 But it's also the responsibility for -- the OCD
8 already has regulations to deal with those bad actors
9 and could take those into hand with the regulations
10 that they have.

11 So I would just say don't unnecessarily
12 punish the small operators, don't just assume because
13 you have marginal wells or inactive wells that those
14 necessarily are risky. They're all not like that,
15 those wells that the OCD expert that was plugging
16 looked at. So they're all very different. They were
17 drilled in different times, with different rules and
18 so forth.

19 And the potential that we have going
20 forward is significant, just like the example that Oxy
21 had. And we don't have these one-size-fits-all
22 decline curves that you can do for all the wells in
23 New Mexico and apply that across the board. They're
24 all different. You re-complete and the curves change.
25 And so that hold-back window can change 50 times over

1 life of a well.

2 MR. SUAZO: Madam Hearing Officer, we do
3 have just a handful of surrebuttal slides to go over.
4 I don't know if you want us to proceed or if you want
5 us to --

6 HEARING OFFICER ORTH: I think proceeding is
7 good.

8 MR. SUAZO: Give us just a second to get
9 that up.

10 BY MR. SUAZO:

11 Q. All right. Mr. Arthur, you had some
12 comments and response to the testimony from applicants
13 and OCD in this proceeding that you wanted to discuss
14 in surrebuttal, correct?

15 A. Yes. So this first one kind of related to a
16 comment that Mr. Purvis made, you know, about the West
17 Texas well, the zombie well. Our firm is actually
18 doing work for the landowner of that zombie well.

19 But the subject well and multiple wells
20 in that area were plugged back in the 1950s.
21 Technology was vastly different, regulations were very
22 different. I worked at EPA, you know, when we
23 developed the Safe Drinking Water Act amendments of
24 the U.S. UIC program to develop what an underground
25 source of drinking water is. That didn't happen

1 until, you know, the '80s.

2 You know, so you look at the things that
3 were done here, people plugged wells as was the
4 industry standard, as maybe if a state had a plugging
5 regulation that they would do that by. But they
6 certainly didn't anticipate, you know, the fracking
7 boom or injection or all these different things that
8 could happen in the future.

9 So those subject wells were plugged back
10 in the '50s. Regulations were very different.
11 Lumping old historic wells and standards into newer
12 well -- into, you know, categories with far newer
13 wells and standards is just wrong and inapplicable.

14 So claims that plugging costs have
15 increased was another thing that Mr. Purvis noted.
16 And I'll say that I'm currently vice president of
17 plugging operations for CSR Services, which is a
18 plugging company. I was part of another one in the
19 mid-continent. But what I'm seeing from that is, you
20 know, pluggers are -- you know, in some areas, costs
21 are going up, and some areas, costs are going down.
22 But a lot of it depends on the well and if you're
23 plugging wells in a forest or next to a house or that
24 is 100 years old or in a corrosive environment.

25 But what I will say is one large

1 mid-continent plugging company plugged last year, this
2 would have been 2024, about 1,000, 1200 wells at an
3 average cost of about \$10,000 per well or under that.

4 Q. And on your next slide, you discuss options
5 that are alternatives to plugging that are available
6 for these types of wells. Can you walk us through
7 that, please?

8 A. So this is this is one example, but
9 certainly there's, you know, state and federally
10 funded plugging reclamation programs, industry groups,
11 you know, private sector incentives.

12 But, you know, returning production or
13 to re-complete wells for improved production -- so,
14 for instance, one of the projects that I've been
15 working on for last several years is short radius
16 horizontal redevelopment of wells. So in this one
17 case, we're taking wells that were initially
18 discovered and drilled from about 1905 to about 1925,
19 where production had fallen, many of them were
20 temporarily abandoned.

21 We went in with the operator and started
22 doing horizontal re-completions. Productions for the
23 producing wells went from about one barrel oil a day
24 or less to about 20 barrels of oil a day. That's been
25 maintained. And as that operator gains money from

1 that production, they do another well that they do the
2 short radius horizontal redevelopment.

3 And so far they've done about 50 wells.
4 And that's been over the last four years. But some of
5 these wells had been shut in, you know, we're talking
6 about six or eight years, I mean, decades. So this is
7 significant.

8 And I'll just say that if you look at
9 short radius horizontals and the way these are being
10 done, it's significant. But you look at -- and I hate
11 to go on here, but if you look at a lot of reservoirs,
12 when we look at the amount of reserves that we get out
13 of those wells through primary production, or even
14 secondary, it's very small.

15 And moreover, what we saw in this
16 particular area with this operator, I'm helping and
17 now we're doing this in a number of places, but an
18 operator will go in and frac a well that maybe is a
19 relatively shallow well and think that the frac, you
20 know, like modern frac, it's going out horizontally,
21 when, in fact, it's not going that far horizontally,
22 it's mostly going up, you know, vertically, and
23 they're missing out on all these other reserves away
24 from the well board. And things like the short radius
25 horizontals let them get out to that oil that could be

1 otherwise produced.

2 And if you didn't do this, those
3 reserves would be lost forever. They wouldn't have
4 known it. Did they have to take a chance to see if
5 this would work? Yes. Is that speculative? Not by
6 my term. Maybe by one of the other experts, but
7 certainly not by me.

8 And there's a lot of other -- this is
9 one example of many things that we're seeing,
10 including, you know, chemical additives and so forth,
11 you know, for unconventional wells that we've seen
12 take production, you know, more than double, you know,
13 by just the way they stimulate a well.

14 Q. All right. And moving on to your next
15 slide, which I think you wanted to address some of
16 WELC's technical expert's testimony, Mr. Alexander.
17 What would you like to note for the Commission with
18 respect to his testimony?

19 A. So Mr. Alexander essentially dismissed the
20 fracking boom, and I thought that was shocking. While
21 Mr. Alexander was at Southwestern Energy, I was a
22 consultant to Southwestern Energy and worked with
23 them. I didn't work directly with him, but a lot of
24 people around him.

25 But I was able to argue in

1 Pennsylvania's Supreme Court on a case noting that
2 hydraulic fracturing had been around since the early
3 1900s. And it has. But that early hydraulic
4 fracturing was using -- you know, dropping torpedoes
5 with nitroglycerin in them to frac a well on it. And
6 what you got was very near wellbore fracking.

7 And then around 2010, when horizontal
8 wells were being fracked in areas like the Bakken or
9 the Barnett, they were single-stage frac jobs with not
10 the volumes that we use now, not multi-stage frac,
11 none of that. The way we do it, the process, the
12 sand, all that is very different.

13 But if you look at before the fracking
14 boom, we were arguing this thing, and this was papers
15 published all over the place, about peak oil. And the
16 thought was, is that in the well, we have reached the
17 point of peak oil. So oil had peaked, we were going
18 to start on the decline, it was going to run out and
19 we were going to be out of oil.

20 And as a result of the fracking boom,
21 that resulted in, you know, the shale revolution,
22 which was the biggest oil boom in our history.

23 So to dismiss that or to say, you know,
24 that there was no fracking boom and then fracking was
25 the same, now I can give you even more examples.

1 One, when we started doing the first
2 well, a horizontal well, attempting to frac in the
3 Bakken, we met with Halliburton and one of our
4 clients. And we said we wanted to do a large fracking
5 job on a horizontal well. Halliburton told us it was
6 technically infeasible and would cost a billion
7 dollars. A year later, we fracked that well with
8 Halliburton and they modified, you know, pumps and
9 stuff onsite, and it worked.

10 So that use of a rigid definition like
11 "speculative" also in the context is there's no more
12 future potential for older conventional wells in
13 today's age, you know. Technology is advancing at
14 exponential pace with AI data centers and microgrids
15 and the need for gas. I mean, what I've told people
16 and I've seen in much of the press and people doing
17 things is we need every molecule of energy that we can
18 get.

19 If the industry didn't take risks and
20 wouldn't be somewhat speculative, there wouldn't be an
21 oil and gas in the well today. There wouldn't.

22 Assumptions presented are highly
23 generalized and lack real well credibility. So
24 that's -- I'm just trying to say, like, if we're going
25 to talk about this stuff, let's be honest and dig into

1 the details and not use these generalities.

2 Q. Your last slide, Mr. Arthur. I think you
3 want to touch on kind of the potential for technology
4 building on what she just said. Can you please
5 quickly go over this slide, surrebuttal testimony?

6 A. Sure. So, unfortunately the creativity of
7 the energy industry and technology advancements are
8 often overlooked, just like they were for the fracking
9 boom. But as I noted before the fracking boom, the
10 key predictions were the oil production had peaked
11 and, you know, we're going to have to find something
12 else. Then curiosity, creativity and technology
13 advancements led to one of the biggest oil and gas
14 booms in history.

15 It's common for professionals,
16 especially university types and so forth, to assess
17 economics based on only limited data that primarily
18 relies on selective history and general data, without
19 considering how much technology has advanced or actual
20 details.

21 So failing to account for creative
22 alternatives to the norm through things like applying
23 technology advancements can yield findings that are
24 simply misleading and short-sighted.

25 MR. SUAZO: All right. Mr. Arthur, thank

1 you so much for your testimony today.

2 Madam Hearing Officer, that concludes
3 our direct rebuttal and surrebuttal. At this time,
4 NMOGA would move to admit the direct testimony of
5 Mr. Arthur, its Appendix A, Mr. Arthur's rebuttal
6 testimony and its Appendix A. The two demonstrative
7 exhibits used for the summary of his direct
8 examination and surrebuttal testimony to the record.

9 HEARING OFFICER ORTH: I'll pause for a
10 moment in the event there are objections.

11 They're admitted.

12 MR. SUAZO: Thank you.

13 (Admitted: NMOGA Arthur Direct
14 Testimony/Appendix A, Rebuttal
15 Testimony/Appendix A.)

16 HEARING OFFICER ORTH: We will need a break
17 before public comment. So let's come back at 10 of
18 4:00.

19 (Recess held from 3:35 to 4:00 p.m.)

20 HEARING OFFICER ORTH: We are on day seven
21 of the hearing in OCC 24683 regarding well plugging
22 and financial assurance.

23 We've reached another public comment
24 session. We have public commenters in the room and
25 public commenters online.

1 Just a few things about public comments.
2 One is, I will ask you to state and spell your first
3 and last name. I will ask you, pursuant to the
4 Commission rules, whether you swear or affirm to tell
5 the truth.

6 And I will ask you to keep your oral
7 comments to three minutes. If you have more to say
8 than that, please submit your written public comment
9 to Sheila Apodaca, there at the back of the room.
10 Her e-mail address is in the public notice.

11 Let's see. Doug Meiklejohn, I saw you
12 come into the room first. If you would join us up
13 here at the witness stand.

14 Well, would you state and spell your
15 first and last name.

16 MR. MEIKLEJOHN: Thank you. First name is
17 Douglas, D-O-U-G-L-A-S. Last name is Meiklejohn, M,
18 as in Mary, E-I-K-L-E-J-O-H-N. That's all one word.

19 HEARING OFFICER ORTH: Thank you. Do you
20 swear or affirm to tell the truth?

21 MR. MEIKLEJOHN: Yes.

22 HEARING OFFICER ORTH: I'll start your time.

23 MR. MEIKLEJOHN: Thank you, Madam Hearing
24 Officer.

25 Commissioners, I am a water quality and

1 land restoration advocate for Conservation Voters
2 New Mexico. Conservation Voters urges you to adopt
3 the proposed revisions to your regulations governing
4 the posting of financial assurances for oil and gas
5 wells.

6 First, you have a responsibility to
7 protect the residents of New Mexico and the state's
8 resources by requiring the posting of adequate
9 financial assurances by oil and gas operators.

10 Second, fundamental fairness demands
11 that if an entity makes money drilling for oil and
12 gas in New Mexico, that entity should have to pay any
13 cleanup cost required after the drilling is finished.

14 Third, the current regulations do not
15 provide that required protection. In the last
16 approximately five years, about \$100 billion in
17 public money, in state and federal funds, has been
18 used to clean up abandoned oil and gas wells.

19 Moreover, abandoned wells pose serious
20 threats to New Mexico's groundwater, which is the
21 source of drinking water for about 80 percent of the
22 residents of New Mexico.

23 For these reasons and the reasons
24 provided by the petitioners and their witnesses,
25 Conservation Voters New Mexico urges you to adopt the

1 proposed revisions to Section 19.15.8 New Mexico
2 Administrative Code.

3 Thank you for your consideration.

4 HEARING OFFICER ORTH: Thank you,
5 Mr. Meiklejohn.

6 The other person in the room is Signa
7 Larralde. If you would state and spell your first
8 and last name.

9 Ms. Larralde: Sure, my first name is Signa,
10 S-I-G-N-A. Last name is Larralde, L-A-R-R-A-L-D-E.

11 HEARING OFFICER ORTH: Thank you.

12 Do swear or affirm to tell the truth?

13 Ms. Larralde: I do.

14 HEARING OFFICER ORTH: I'll start your time.

15 Ms. Larralde: Good afternoon, oil and gas
16 Commissioners. My name is Signa Larralde. I'm a
17 retired archaeologist. I'm speaking on my own behalf
18 in strong support of the proposed bonding rule
19 changes.

20 Although New Mexico has already spent
21 over \$100 million in state and federal public funds
22 to clean up orphaned and abandoned wells, there are
23 still over 700 wells to be cleaned up. An additional
24 4,400 wells are expected to be added to the list in
25 the near future.

1 Cleanup costs for existing wells, that's
2 the current state of wells needing mitigation, are
3 estimated at \$1.6 billion. And that doesn't count to
4 God only knows how many future wells will be added to
5 the list if the proposed rule is not adopted. These
6 figures show why changes in the bonding rules are
7 necessary.

8 The public did not leave the landscape
9 in this mess. That was the oil and gas industry. I
10 have spent considerable time in both the Permian
11 Basin oil fields and the oil fields of Northwestern
12 New Mexico. And I've seen these sites firsthand.
13 This abandoned industrial waste is not only a health
14 hazard for rural and tribal communities and a blight
15 on the landscape, it's a huge cost that industry
16 should bear as the responsible party.

17 According to a recent statewide poll,
18 nearly nine in ten New Mexicans agree, as well as the
19 State Land Office and the Oil and Gas Division. The
20 responsible party, be it a small independent operator
21 or a large corporation, needs to supply adequate
22 bonds upfront for plugging every well they intend to
23 drill, no exceptions. After all, these are the
24 parties that reap the profits from oil and gas
25 extraction.

1 I urge you to vote to adopt the stronger
2 rules on oil and gas bonding in their entirety.
3 Thank you for the opportunity to comment on this
4 important rule change.

5 HEARING OFFICER ORTH: Thank you,
6 Ms. Larralde.

7 As Sheila, can you pull up Julia
8 Whipple?

9 Ms. Whipple, would you state and spell
10 your first and last name, please.

11 MS. WHIPPLE: Julia Whipple, J-U-L-I-A,
12 W-H-I-P-P-L-E.

13 MS. FEMALE: Do swear or affirm to tell the
14 truth?

15 MS. WHIPPLE: Yes.

16 HEARING OFFICER ORTH: All right, I'll start
17 your time.

18 MS. WHIPPLE: Thank you. My name is Julie
19 Whipple, and I grew up in San Diego, California. I
20 spent 12 years in Sierra Vista, Arizona. And I've
21 lived the last 16 years here in Artesia, New Mexico.

22 While living in Artesia, my family has
23 enjoyed the natural wonders here in the Southeastern
24 New Mexico area, to include the Pecos River, Sitting
25 Bull Falls, and Carlsbad Caverns.

1 I earned a bachelor of arts degree in
2 multiple subjects from the University of Redlands in
3 California, and I've taught all ages from early
4 intervention with CARC, to K through 5 classroom
5 teaching, tutoring all ages, college-level teaching
6 for seven years.

7 Here in Artesia, I ran our local Meals
8 on Wheels program. The non-profit program is not
9 only blessed with financial support from local oil
10 and gas companies, but many employees spent their
11 lunch breaks helping deliver meals. The Artesia
12 Meals on Wheels program runs entirely on donations
13 and volunteers deliver all the meals. Currently, I
14 work in real estate.

15 Although no one in my family currently
16 works in the oil and gas industry, we have all
17 enjoyed the many benefits of living in this area and
18 the support local oil companies have given our
19 community. Four of my 12 children have benefited
20 from scholarships in support of educational and
21 recreational programs through generous donations from
22 local oil and gas companies. I have one daughter who
23 graduated from UNM with zero debt.

24 The oil and gas money produced here in
25 southern New Mexico supports the entire state.

1 Overregulation of the industry will cause the economy
2 and Artesia to collapse. In the time I've lived here
3 I've had good friends move to Texas because the
4 companies they work for have moved their
5 headquarters. Our largest building here in town
6 nearly emptied when EOG moved their main operations
7 to Texas.

8 If the oil and gas industry in
9 New Mexico collapses due to over regulation, our
10 small city, along with many other rural economies in
11 southern New Mexico will be devastated. Many will
12 lose their jobs and income even if they aren't
13 working in the industry. The generous companies in
14 our area sponsor many community events and give our
15 city great support.

16 I ask you to consider me and families
17 like mine when you decide on the future and the
18 regulations of the oil and gas industry. Thank you
19 for your time.

20 MS. FEMALE: Thank you, Ms. Whipple.

21 We have Pauline Hovey. Ms. Hovey, can
22 you unmute yourself.

23 MS. HOVEY: Yes. My name is Pauline Hovey.
24 I'm a citizen --

25 HEARING OFFICER ORTH: I'm sorry. Hold on

1 one second. I have to ask you to spell your first
2 and last name.

3 MS. HOVEY: Pauline, P-A-U-L-I-N-E. My last
4 name is Hovey, H-O-V, as in Victor, E-Y.

5 HEARING OFFICER ORTH: And you swear or
6 affirm to tell the truth?

7 MS. HOVEY: I do.

8 HEARING OFFICER ORTH: I'll start your time.

9 MS. HOVEY: Okay. Thank you.

10 So my name is Pauline Hovey. I'm a
11 citizen, resident and taxpayer here in New Mexico. I
12 also happen to be a Christian who cares for our land
13 and our neighbors. And I know that for the most
14 part, we New Mexicans are not wealthy people. Many
15 of my fellow New Mexicans live on limited incomes,
16 barely affording to pay their monthly bills.

17 For me, it's unconscionable and
18 unethical that we, the taxpayers, would bear the
19 brunt of cleaning up after oil and gas corporations
20 that profit immensely from drilling in our state. I
21 believe it's absolutely necessary that we require
22 these companies not only clean up after themselves,
23 but also handle any additional costly messes and
24 ensure that their projects will not create any
25 negative consequences, such as pollution and

1 environmental hazards to our state. To me, that's
2 just common sense, not asking for overregulation, but
3 that they take up their responsibility.

4 In the interest of all New Mexicans, I'm
5 urging you to please modernize and increase the
6 bonding insurance and cleanup rules to require that
7 all oil and gas companies who do business in our
8 state step up and be responsible for their actions
9 that adversely affect our health, our financial
10 situation, our land and our natural resources.

11 Please do not back down on this. Don't
12 let them walk away from any harm or messes they
13 create. Let's increase the bonding insurance and
14 let's take care of all New Mexico and all of
15 New Mexicans. Thank you.

16 HEARING OFFICER ORTH: Thank you, Ms. Hovey.

17 Do we have Ava Curtis.

18 MS. CURTIS: Yes.

19 HEARING OFFICER ORTH: Hello. Would you
20 spell your first and last name?

21 MS. CURTIS: So that's going to be A-V-A and
22 then C-U-R-T-I-S.

23 HEARING OFFICER ORTH: Do swear or affirm to
24 tell the truth?

25 MS. CURTIS: I do.

1 HEARING OFFICER ORTH: I'll start your time.

2 MS. CURTIS: Thank you.

3 Good afternoon, Chair, Commissioners.

4 My name is Ava Curtis. I'm speaking today on behalf
5 of myself as a resident of Albuquerque and on behalf
6 of the Rio Grande Chapter of the Sierra Club as a
7 member in strong support of the proposed bonding rule
8 changes.

9 Right now, oil and gas corporations can
10 drill dozens or even hundreds of wells in New Mexico
11 while posting bonds that cover only a fraction of the
12 cost. The legislative finance committee found
13 plugging to cost an average of over \$160,000 per well
14 and some costing as much as \$700,000 per well.

15 Because of the outdated bonding rules,
16 the public is left paying to plug wells to prevent
17 them from releasing toxins into the air and water.
18 In the last five years, over \$100 million in public
19 funds, state and federal, have been spent to clean up
20 abandoned wells. Simply put, this is not the
21 responsibility of the New Mexico taxpayers.

22 We still face up to \$1.6 billion in
23 future cleanup costs. Consider what \$1.6 billion
24 could provide for New Mexicans and for our
25 communities.

1 These abandoned wells don't just create
2 financial risks. They're dangerous. The methane and
3 toxins leak into the air and into our groundwater,
4 harming wildlife and public health, especially in
5 rural and tribal communities.

6 Air quality is critical to our health.
7 Air pollution harms us all, not just leading to
8 respiratory problems, but other less commonly
9 associated problems with air pollution, including
10 neurological disease.

11 New Mexicans deserve safe, clean air,
12 and we don't deserve to be left with a massive \$1.6
13 billion cleanup bill when these oil and gas companies
14 make billions of dollars every year.

15 These rule updates are a chance to
16 finally align policy with common sense. Please vote
17 to adopt stronger bonding measures. Let's protect
18 our air, water and wallets and make sure that no one
19 gets to profit off of New Mexico while leaving the
20 taxpayers to clean up their mess. Thank you.

21 MS. HOVEY: Thank you, Ms. Curtis.

22 Is there anyone else on the platform who
23 would like to offer public comment? I see Alicia.
24 Can you unmute yourself? Alicia. It might help to
25 press control-shift-M to unmute.

1 All right. Is there anyone else on the
2 platform who would like to offer public comment
3 during this session? Our next session is 9:00 a.m.
4 tomorrow morning.

5 Alicia, let me encourage you to work on
6 unmuting and to join us either at 9:00 o'clock.

7 MS. BOMHOFF: I think I did. All right. I
8 don't know how. I think I did command-shift-M or
9 something. Anyway, I was trying everything I could
10 just because I'm here, I've been listening all day,
11 and I just wanted to throw in my two cents. After
12 listening to all the experts, I think that's really
13 all I have to offer, is two cents.

14 HEARING OFFICER ORTH: Hold on, hold on. I
15 need to spell your first and last name for the
16 transcript.

17 MS. BOMHOFF: It's Alicia, A-L-I-C-I-A. And
18 my last name is Bomhoff, B, as in boy, O-M-H-O-F-F.

19 HEARING OFFICER ORTH: Do swear or affirm to
20 tell the truth?

21 MS. BOMHOFF: Yes.

22 HEARING OFFICER ORTH: All right. Thank
23 you. I'll start your time.

24 MS. BOMHOFF: I'm listening to this on the
25 heels of listening to days of water quality

1 Commission testing Zoom meetings, about the
2 governor's recent decision to let the oil and gas
3 companies dump fracked water in New Mexico's
4 waterways. And I've been kind of sick about that
5 ever since.

6 And this comes on the heels of that and
7 contributes to it, especially since, you know, again,
8 really what we're looking at is the health of the
9 residents of the state of New Mexico ultimately.

10 And even though Mr. Wallace [sic] says
11 that, you know, you can't tell if his well is going
12 to cost \$150,000 or \$1,000, he does admit that the
13 oil and gas industry has had the largest boom in
14 history recently, with all of its drilling and
15 fracking.

16 And, you know, Biden said no more fossil
17 fuels and yet went ahead and made us the largest
18 producer of fossil fuels on the planet. On the
19 planet.

20 So we are now heating Europe, and Trump
21 wants to heat India, and we're cooking ourselves in
22 the process. And Mr. Wallace, in spite of this, you
23 know, wonderful boom, this economic boom, doesn't
24 make any mention of the environmental costs of this
25 boom in fracking and oil production. It's not hard

1 to see that every year it gets hotter and hotter.

2 And, you know, my 84-year-old aunt's air
3 conditioner just broke. It's \$6,500 to replace.
4 Luckily, I live in Taos, New Mexico, where I don't
5 need an air conditioner, and I live off the grid and
6 sun heats my house. I don't actually use oil,
7 although I do use a little bit of propane for my
8 stove.

9 But, I mean, we live in a solar state,
10 and there really is no reason for us to continue
11 polluting at this rate when New Mexicans' health is
12 really at stake. And I think we learned during
13 COVID, you have to put health before wealth. And
14 just because the oil industry might sponsor some
15 events, does not outweigh them taxing people for the
16 cleanup that they've already caused that needs to be
17 done. And what about the future deterioration of our
18 climate, our water, and the things that we really
19 rely on to make our lives beautiful?

20 And I'm just disgusted with the oil and
21 gas industry not being held accountable. And, you
22 know, Mr. Wallace was kind of convincing. You don't
23 want to charge people too much and discourage
24 business. Well, if they've had this giant boom, I
25 think they can afford to clean up after themselves.

1 Or, like what he mentioned in Colorado, go somewhere
2 else. Keep ruining Texas. It's already pretty bad.
3 Nobody cares.

4 They all want to leave Texas and come to
5 New Mexico. Why? Because New Mexico is still nice.
6 But if you kind of ruin one state after another,
7 especially one that could be completely solar, it's a
8 sad, sad thing that's happening. So I just wanted to
9 add that two cents, and thank you for listening. And
10 I just am hopeful for a future where we really do go
11 solar in New Mexico and we do discourage pollution of
12 our water and our air.

13 And, you know, New Mexico's has a long
14 history of being a dumping ground for much worse
15 things, like depleted uranium and nuclear waste. You
16 know, I mean, somebody has got to finally say enough
17 is enough and turn this thing around. It's possible.
18 It's possible.

19 HEARING OFFICER ORTH: Thank you,
20 Ms. Bomhoff.

21 Is there anyone else on the platform
22 who's here to offer public comment? The next session
23 is at 9:00 in the morning. If you have dialed in on
24 your phone, you can press star 5 to raise your
25 virtual hand.

1 Collin Underation. Let's see here.

2 MR. UNDERATION: Good afternoon.

3 HEARING OFFICER ORTH: Hello. Would you
4 spell your first and last name please.

5 MR. UNDERATION: My first name is Collin,
6 C-O-L-L-I-N. And my last name is Underation,
7 U-N-D-E-R-A-T-I-O-N.

8 MS. BOMHOFF: Thank you. Do swear or affirm
9 to tell the truth?

10 MR. UNDERATION: I do.

11 MS. BOMHOFF: All right. I'll start your
12 time.

13 MR. UNDERATION: All right. I just wanted
14 to express my concern for the proposed rule change.
15 I worked for a small oil and gas company in Southeast
16 New Mexico, and while I do support responsible
17 producing, I'm afraid that these rules are going to
18 affect the small men, the small company a whole lot
19 more than the large companies.

20 And I depend on the oil and gas
21 industry. My family depended on the oil and gas
22 industry my whole life. And I just want to make sure
23 that the rules are in place for everybody to thrive
24 in this environment.

25 I know that pollution and waste is a big

1 issue, but we need to make sure that the rules were
2 put in place don't just drive out the small people
3 and send all the money out of state to the large
4 companies. That's about all.

5 HEARING OFFICER ORTH: Thank you,
6 Mr. Underation.

7 Is there anyone else on the platform to
8 offer comment at this time? The next session is 9:00
9 a.m. No?

10 All right. We will return to the
11 technical case then.

12 And let's see, Mr. Arthur, will you join
13 us at the front of the room here.

14 Ms. Fox or Mr. Tisdell.

15 MR. TISDELL: Yes. Thank you, Madam Hearing
16 Officer.

17 CROSS-EXAMINATION

18 BY MR. TISDELL:

19 Q. Hello, Mr. Arthur. We met earlier, but I'm
20 Kyle Tisdell. I'm with the Western Environmental Law
21 Center, and I represent the applicants in this case?

22 A. Good to meet you.

23 Q. And thank you for your testimony today.

24 You filed direct and rebuttal testimony
25 in this rulemaking on behalf of NMOGA, correct?

1 A. Correct.

2 Q. Do you have the direct and rebuttal
3 testimony available and with you?

4 A. Yes.

5 Q. Great. And you're the author of that
6 testimony, correct?

7 A. Correct.

8 Q. Did anyone else help you prepare the
9 testimony?

10 A. Yes. I had other people with my firm that
11 assisted.

12 Q. Okay. Have you reviewed and are you
13 familiar with the applicant's proposal and the subject
14 of this rulemaking?

15 A. I think so, yes.

16 Q. And have you reviewed the pre-filed direct
17 and rebuttal testimony that's been filed by other
18 technical and fact witnesses in this case?

19 A. Not every single one, but I've read a bunch
20 of those.

21 Q. Okay. And I think I heard you say earlier
22 that you did listen to some of the testimony in the
23 last week or so, but maybe not all of it; is that
24 correct?

25 A. Right.

1 Q. Okay. Let's begin with the expertise that
2 you're offering in this rulemaking. You're the
3 founder and president and chief engineer of ALL
4 Consulting, and you've been doing that for over 26
5 years; is that correct?

6 A. Yeah, 27 years.

7 Q. Great. And you're a registered professional
8 engineer in 36 states, including New Mexico?

9 A. Correct.

10 Q. But you don't live in New Mexico; is that
11 right?

12 A. I do not.

13 Q. And through your engineering and consulting
14 practice, you describe being an expert witness on more
15 than 2,500 dockets and more than 100 litigation cases;
16 is that right?

17 A. Yes.

18 Q. Quite prolific. You must be very busy. By
19 my lawyer math, that's over 100 cases a year for your
20 time as a consultant. Does that sound about right?

21 A. It depends. The dockets I refer to are,
22 like, hearing dockets at various different states. So
23 some of those can occur in many dockets in a single
24 day, for instance.

25 Q. How many cases or dockets are you

1 participating in right now?

2 A. Six or seven cases.

3 Q. Okay. You're not an attorney; is that
4 correct?

5 A. Correct.

6 Q. So while you're not offering your expert
7 legal opinion, based on your testimony, you are
8 familiar with New Mexico's Oil and Gas Act and
9 relevant provisions of the administrative code as it
10 pertains to oil and gas operations in the state; is
11 that correct?

12 A. Generally. I'm not the super expert in
13 every single detail. But yes, I'm the nerdy technical
14 guy.

15 Q. You did go through those provisions pretty
16 extensively in your direct and rebuttal testimony as
17 well as in your summaries so far.

18 A. So I sure tried to.

19 Q. Throughout your direct and rebuttal
20 testimony, you referenced the data, statistics and
21 analysis from various sources, including energy
22 information administration, the New Mexico legislative
23 finance committee, as well as evidence provided by
24 applicants in their direct, among other evidence; is
25 that correct?

1 A. Yes.

2 Q. Going through your testimony, I didn't see
3 any independent data or statistical analysis that was
4 included; is that correct?

5 A. Yes.

6 Q. Did you include any independently prepared
7 tables or graphics or calculations in your testimony?

8 A. I did not.

9 Q. I also didn't see a list of materials that
10 you relied upon when forming your opinion in this
11 case; is that correct?

12 A. I believe that's correct. Can I take a look
13 here.

14 Q. Certainly.

15 CHAIR CHANG: Just for my benefit, could you
16 repeat the question? I just missed it.

17 MR. TISDEL: Yeah. I asked whether he
18 listed any materials that he relied upon in forming
19 his opinion in the case.

20 CHAIR CHANG: Thank you.

21 A. Yeah, it does not appear that we included
22 that.

23 Q. So your commentary in this case is based on
24 applying your general expertise in the field to the
25 work of others in this case; is that correct?

1 A. I'd say in general, yes.

2 Q. Okay. Great. Part 25 NMAC involves the
3 plugging and abandonment of wells with the general
4 idea that after a certain amount of time, an inactive
5 well either needs to be plugged or it needs to go into
6 temporary abandonment status; is that about right?

7 A. Yes.

8 Q. And under current rules, there's no
9 limitation on the amount of time that a well can sit
10 in temporary abandonment, or TA, status; is that
11 right?

12 A. Essentially.

13 Q. Indeed, there are many wells that have not
14 produced any oil and gas for decades, but they're
15 still on that temporary abandonment list; is that
16 correct?

17 A. I would say, yes, that's generally the case
18 throughout the country.

19 Q. And currently, the terms "beneficial use" or
20 "beneficial purposes" appear throughout the rules, but
21 they currently don't have a definition in New Mexico;
22 is that right?

23 A. Correct.

24 Q. And OCD has proposed to define these terms
25 at what would be 19.15.2.7B(7) NMAC. And that

1 proposed definition has been adopted by applicants; is
2 that right?

3 A. I don't have all the numbers memorized, but
4 I believe I know what that is.

5 Q. It's just the definition, a proposed
6 definition of beneficial use and beneficial purposes.

7 A. I just would like to -- could we pull that
8 definition up so I can see.

9 Q. I'm not going to probe into that. It's just
10 the general proposition that a definition doesn't
11 currently exist, but it's being proposed --

12 A. Yes.

13 Q. -- in this process, right?

14 A. Yes.

15 Q. All right. For purposes of Part 25, OCD has
16 proposed and applicants have adopted a presumption of
17 no beneficial use; is that correct?

18 A. Yes.

19 Q. And that presumption includes a rebuttal
20 presumption that a well is not capable of beneficial
21 use if in a consecutive 12-month period, the well has
22 not produced for at least 90 days and has not produced
23 at least 90 BOE; is that right?

24 A. I believe so, yes.

25 Q. And I know you said earlier that you didn't

1 hear all the testimony, but did you hear the testimony
2 of OCD Deputy Director Brandon Powell in his
3 suggestion to drop the days of production threshold
4 from this presumption?

5 A. I did not hear that testimony.

6 Q. Okay. And so I assume you also didn't hear,
7 you haven't talked to counsel about Mr. Powell's
8 description that the days of production criteria could
9 be easily manipulated and that production threshold
10 alone was sufficient?

11 A. We did not discuss.

12 Q. Now I'm going to go through a few provisions
13 of your direct and rebuttal. I will quote back to you
14 where appropriate. I'm going to try to avoid putting
15 it up on the screen, just to save us all the time. If
16 you want me to pull it up, I'd be glad to, but I'm not
17 trying to parse your specific words. I'm just using
18 those as general references. Okay?

19 A. I tend to prefer seeing it, if that's okay.

20 Q. Sure. If you need them after I'm describing
21 them, just let me know if that doesn't sound right or
22 if you want to actually look at the language. Okay?

23 A. Okay.

24 Q. All right. So at page 8 of your direct
25 testimony you state, and I think you stated earlier

1 today as well, that the 90-day criteria are too rigid
2 and that operators may intentionally shut in wells for
3 extended periods, often exceeding 12 months. And then
4 you list a number of reasons why that might be the
5 case. Does that sound right?

6 A. Yes.

7 Q. Do you still stand by that statement for
8 purposes of the 90-day production criteria?

9 A. I do.

10 Q. And your testimony, I think I heard you say
11 earlier today, is that that 90-day period should be
12 extended to five years; is that right?

13 A. That would be reasonable.

14 Q. Okay. Even in light of Mr. Powell's
15 description that such criteria at that level could be
16 easily manipulated by industry and that the production
17 threshold alone is sufficient?

18 A. I didn't hear his testimony, so I can't
19 comment on that.

20 Q. But can you comment on the sort of your
21 recommendation of five years versus that
22 recommendation that the days of production be dropped
23 from the beneficial use definition?

24 A. I think I already talked about that in my
25 direct testimony that we just talked about. But 90

1 days is a very short window. I can concur that there
2 may be experiences where you have wells that you don't
3 want to maybe extend to that degree. But that's just,
4 I'd say, an unreasonable window.

5 Q. Okay. So focusing just on the 90 BOE
6 production threshold, that's just 0.25 BOE per day; is
7 that correct?

8 A. I didn't do the math, but that sounds about
9 right.

10 Q. Okay. And in your direct testimony, you
11 talk about sort of stripper wells as being a category
12 of well that's sort of recognized both in New Mexico
13 and nationally as a low-producing well, correct?

14 A. I'd say that's reasonable to categorize it
15 that way.

16 Q. And a stripper well produces 10 BOE per day
17 or less over a 12-month period. Does that sound like
18 the right definition?

19 A. There are multiple definitions across the
20 country, but that's generally one, yes.

21 Q. And the IOGCC talks about that definition;
22 is that right?

23 A. They do. And they had a report that came
24 out on that. But again, it can vary.

25 Q. So for comparison, a stripper well is

1 defined as anything less than essentially 3,650 BOE
2 over a year. And the rebuttable presumption for no
3 beneficial use being proposed is just a fraction of
4 that 90 BOE per year; is that correct?

5 A. It's a portion of it. But I will also say
6 that I know viable wells is the example that I gave
7 that had been producing even a quarter barrel a year
8 for 100 years.

9 Q. Okay. And for even a well that's producing
10 less than this very small amount, under applicant's
11 proposal, an operator still has the ability to rebut
12 the presumption of no beneficial use and thus avoid
13 the plugging of that well; is that correct?

14 A. Technically, that's available.

15 Q. And you've identified even the type of
16 criteria that could be provided to rebut that
17 presumption, and that could be provided to OCD,
18 correct?

19 A. Yes. And that on a multi-well basis could
20 be a significant overhead cost to any operator. And,
21 you know, so with considering that just because it's
22 low producing, it's non-economic or whatever,
23 that's -- you know, what's partially driving some of
24 this as opposed to, you know, not necessarily coming
25 to a specific assumption.

1 Q. Each drilling permit comes with the
2 expressed obligation that the operator plug and
3 abandon that well at the end of its life; is that
4 correct?

5 A. I believe so, yes.

6 Q. And unfortunately that doesn't always
7 happen, do you agree?

8 A. Over what time frames are we talking about?
9 So are we're talking about current drilling permits?
10 Are we talking drilling permits that were issued in
11 1928 when the first well was drilled in the New Mexico
12 Permian Basin.

13 Q. I'm talking about the general idea that
14 orphan wells exist.

15 A. So right now, so the permits right now,
16 there's orphan wells that exist. But just like some
17 of the comments that we had about this, the costs of
18 plugging that have gone on -- right now, this is -- a
19 lot of those wells are old wells that were abandoned
20 by operators a long time ago. Just like the examples
21 that the OCD gave, the number of wells that get -- you
22 know, it's not just across the board. So there's good
23 operators, maybe there is bad actors and all that.
24 But so yes, that does happen.

25 I'm dealing with another litigation case

1 right now where there was a bad actor that did exactly
2 that. But by and large -- again, remembering that
3 95 percent of the wells are plugged by private
4 industry.

5 Q. But you agree that the OCD maintains an
6 orphan well list? So there's a list of wells that
7 have been abandoned by their operators, correct?

8 A. There have been, yes.

9 Q. When an operator declares bankruptcy or
10 otherwise walks away from their plugging obligation,
11 those wells are referred to as stripper wells. Yes?
12 Excuse me, correct that. Those wells are referred to
13 as orphan wells, correct?

14 A. Right, I would generally say that. But I
15 would offer something within the context of that, that
16 there are bankruptcies. There are companies that go
17 out of business that lose their well.

18 I will also say that in that line, that
19 doesn't mean that everyone that's declared bankruptcy
20 is a bad actor. Nobody expected the price of oil to
21 shoot down to minus \$47 a barrel during COVID. I went
22 to work for EPA in the 1980s, when oil went down to \$6
23 a barrel, because I needed a job. But there was a lot
24 of bankruptcies and a lot of those bankruptcies were
25 big companies.

1 So it does happen and the state has a
2 fund that helps with that. Those companies would have
3 been required to have the blanket bonds and so forth
4 with that, too. So it's not like there wasn't a
5 financial assurance available and present.

6 Q. You testified earlier today, I think in your
7 summary, and you said, quote, orphan wells are a
8 problem. Do you recall that?

9 A. Yes.

10 Q. And you believe that's true nationally and
11 here in New Mexico; is that correct?

12 A. You can find a lot of stuff on the internet
13 where I've looked at problem wells and so forth. And
14 orphan wells can be a problem. Orphan wells, I'll
15 tell, they can be an opportunity, too. So they can be
16 a problem.

17 It really depends on assessing those
18 wells and looking at the risks. So to be able to say,
19 is every orphan well a problem? I would say no. So
20 orphan wells can be a problem, but in California and
21 other states, they're converting some of those wells.
22 In Oklahoma and Missouri, converting some of them for
23 geothermal energy, for long term battery storage.

24 Louisiana just= permitted the first
25 bio-oil injection class 5 -- converted an orphan well

1 to a class 5 commercial experimental well for bio-oil
2 injection, which was CO2 sequestration.

3 So there are opportunities, but they can
4 be a problem. Some of them are purging. Some of them
5 have been there for decades and decades and decades
6 and they have corroded casing, like some of the
7 examples that you saw, yes.

8 Q. And I'm reluctant to conflate different
9 sections of the proposed rules, but for both the
10 presumption of no beneficial use as well as the
11 marginal well definition or the demonstration of
12 putting a well into temporary abandonment status, that
13 is all the type of information that an operator could
14 provide to OCD, correct, that would either justify
15 that a well has a beneficial use or justify that a
16 well should be eligible to be in approved temporary
17 abandonment status? Do you agree?

18 A. So your question was that an operator could
19 provide, and -- you know, and so what is -- you know,
20 what is needed to provide.

21 So if you're a regulatory agency, and
22 I'm a former regulator and worked as an expert with
23 multiple state oil and gas regulatory agencies and so
24 forth, you know, if I ask an operator, "Well, you
25 know, you could provide some stuff," as opposed to

1 helping them understand what we need as a regulator,
2 it's kind of two different things.

3 So, you know -- and moreover, you know,
4 if you're thinking that you're going to, you know,
5 re-complete wells or do an EOR project or whatever, I
6 mean, sometimes like the Oxy example, that can take a
7 long time. So you could provide those things that
8 you're thinking of, but you may say, well, we're
9 looking at three different things, three different
10 opportunities to be able to see what these -- you
11 know, what looks appropriate, what looks like it will
12 be the best option for us, for these wells. And it
13 may turn out that all three of those things didn't
14 work and they find something else.

15 Q. But the proposed rules allow an operator to
16 take that information to OCD, correct?

17 A. They don't prevent it.

18 Q. Indeed, the proposed rules encourage an
19 operator to take that information to OCD, correct?

20 A. They talk about a lot of information that
21 can be provided and so forth, which can be a
22 challenge. But they do allow that.

23 Q. So you did testify that you closely read the
24 LFC report. Did I hear that earlier today?

25 A. Yes.

1 Q. And in the summary of the LFC report, it
2 identifies that OCD has plugging authority for roughly
3 700 wells, will likely need to plug an additional 1400
4 inactive wells, and that there are more than 3000
5 wells at risk of being orphaned. Does that sound
6 correct?

7 A. Sounds correct.

8 Q. And you don't dispute those numbers?

9 A. No. I don't have the LFC report in front of
10 me, but that sounds -- from the immediate memory, that
11 sounds...

12 Q. So according to the LFC, and as you agree,
13 the orphan well problem in the state is poised to
14 become worse; is that correct?

15 A. I would say that there may become more
16 orphan wells, and -- unless there are other options
17 for that. But there could become an increase in
18 orphan wells based on what was included in the LFC
19 report.

20 But I have not looked at all of those
21 wells and seen what the viability is and so forth.
22 And I don't know that they necessarily did either.

23 Q. Okay. The LFC also estimates the state's
24 current and near future liability for well plugging
25 and site remediation at between 700 million and 1.6

1 billion. Does that sound correct?

2 A. That's what they estimated.

3 Q. And you don't dispute those estimates?

4 A. I understand that's what's there. I think
5 that -- I don't think that they considered everything
6 that they should have when they put those numbers
7 together.

8 Q. Do you know the current balance of the
9 state's reclamation fund?

10 A. I don't -- I didn't -- I haven't
11 specifically looked at that, but I want to say it was
12 like \$46 million or something like that.

13 Q. It's 66 million, but -- does that sound
14 right?

15 A. Sounds about right.

16 Q. Okay. And are you aware that New Mexico has
17 received 55 million roughly in federal grants through
18 the orphaned oil program and is eligible for 111
19 million more in federal grants?

20 A. I am.

21 Q. So even with the federal grants, there's a
22 massive gap between the amount available in the
23 Reclamation Fund and the state's near-term plugging
24 liability? Would you agree that's correct?

25 A. Based on what the LFC assumed, based on

1 relatively high plugging rates that doesn't account
2 for, for instance, some of the testimony that I
3 provided that both can be plugged for a lot less,
4 often.

5 Q. But you agree that this gap represents a
6 major financial risk to the state?

7 A. I don't know that I necessarily do agree
8 with that, because I think that a lot of what the
9 states have been getting money for and that you've
10 seen on plugging have been high-risk, wells that did
11 have exactly like the examples that the OCD witness
12 showed, was wells that were in significant disrepair
13 and problems. And they're all not like that.

14 Q. And you testified earlier today that OCD
15 takes on the worst of the worst.

16 A. They often do. But I would also say that
17 it -- you know, based on my experience with the state
18 plugging stuff, they cannot do things like sell pipe,
19 where an operator can, so they're not allowed to. So
20 there's different things from both well-plugging and
21 site restoration.

22 So we just cleaned up another site that
23 I was involved with that had a zero net cost by
24 letting -- by essentially selling all the surface
25 equipment, tanks and pump jacks and all that kind of

1 stuff, to offset the actual restoration costs.

2 So there's -- you know, is there truly
3 this massive disparity about the potential of what is
4 going to be needed versus what is actually there? I
5 don't know that that work has truly been done.

6 Q. When a well becomes orphaned, it is the
7 state that plugs that well. You would agree?

8 A. Are we talking in all cases? So on federal
9 land or in, like, tribal land or just like -- I would
10 say generally it is, but there's also --

11 Q. Exceptions to the rule.

12 A. There's also many exceptions to the rule.
13 So like, for instance, in the state of Texas, a
14 landowner can get partial plugging from the state,
15 like half, half of the estimated plugging costs, and
16 they would take on the other half and plug the well.

17 There's, you know, companies that are
18 plugging wells for carbon credits. There are all
19 sorts of different things.

20 Q. Here in New Mexico, orphan wells are plugged
21 by OCD. Would you agree with that?

22 A. Unless they're plugged by someone else. But
23 that's their -- OCD is the primary.

24 Q. Okay. And financial assurance operates,
25 more or less, like an insurance policy for the state

1 in the event that a well becomes orphaned? Would you
2 agree with that?

3 A. I'd say that's correct.

4 Q. And financial assurance is required by the
5 Oil and Gas Act, correct?

6 A. It is.

7 Q. So it's then the cost to the state and not
8 the operator that is relevant for the plugging of
9 orphaned wells? You would agree with that?

10 A. Well, less the amount of financial assurance
11 that that operator had in place.

12 Q. Sure. And according again to the LFC
13 report, the average cost to OCD to plug a well is
14 \$163,000. You would agree with the LFC report that
15 that's what the LFC report stated?

16 A. That's what the LFC report stated and base
17 their numbers off of, which is, you know -- you
18 know -- you know, that's like saying I'm going to
19 build the Empire State Building, I'm going to build a
20 small two room, you know, shack, and they're both
21 going to cost the same.

22 Q. Okay. But that is the average cost for OCD
23 for their plugging, right?

24 A. For the plugging that they've done so far on
25 problem well, yes. Which is different than plugging

1 costs for wells across the board.

2 Q. And so based -- current blanket plugging
3 financial assurance for active wells right now,
4 currently, is set at a maximum of \$250,000 for
5 operators of more than 100 wells, correct?

6 A. Correct.

7 Q. So based on OCD's average cost to plug, that
8 would amount to less than two wells plugged, correct?

9 A. Based on that plugging cost for problem
10 miles, that's correct. However, as I noted, many
11 wells don't cost anywhere near that amount of money to
12 plug. So, you know, whether it's OCD or an operator,
13 you know, all the wells don't cost that much. Okay.

14 Q. You would agree that a well that's producing
15 a lot of oil or gas doesn't have much near-term risk
16 of becoming orphaned, right.

17 A. I've seen wells that had higher production
18 rates become orphaned. So, for instance, if you look
19 at the number of companies that went bankrupt during
20 the COVID pandemic when oil hit minus \$47 a barrel,
21 there were some companies that went bankrupt that had
22 high-producing wells.

23 In 1982, I was working for a company and
24 Penn Square Bank went bankrupt and every company that
25 had, you know, loans through them got forced into

1 bankruptcy.

2 You know, so yeah, can you have higher
3 rate wells that become orphaned? Yes.

4 Q. Those would be exceptional circumstances,
5 that a high-producing well that an operator would walk
6 away from. Would you agree with that?

7 A. Similar exception to the extraordinary
8 plugging costs that the LFC report, you know, showed
9 from based on OCD's averages that don't align with
10 normal operations. So, they're both looking at
11 extremes.

12 Q. Okay. But then, you know, just sort of
13 thinking about that, your testimony is that a well
14 that's producing less than 90 BOE over the year, that
15 those wells have a lot of utility, right? But that a
16 well that's like highly producing oil and gas, an
17 operator would still walk away from that, but there's
18 a little contradiction there. Would you agree?

19 A. Are you suggesting a well that produces 90
20 barrels of oil that, you know, an operator wouldn't
21 have a problem walking away from.

22 Q. I'm suggesting that there is a presumption
23 of no beneficial use for a well that produces less
24 than 90 BOE, that there's a -- that presumption is
25 rebuttable, but --

1 A. I know a lot of small operators, family
2 operators that wells like that are critical to their
3 future and their livelihood.

4 Q. Okay. In both your direct and rebuttal
5 testimony, you advocate for a risk-based bonding
6 approach; is that correct?

7 A. Yes.

8 Q. There's many ways to quantify a risk. You
9 would agree with that?

10 A. I do.

11 Q. And in your direct testimony, you offer that
12 risk-based bonding should consider operator compliance
13 history, well-condition, asset maturity and
14 demonstrated plugging costs, correct?

15 A. Those are some of the things to consider. I
16 mean, you know, I helped the OCD develop the
17 risk-based data management system. So the idea of
18 risk can include a number of different things. So you
19 have to look at that with an experienced eye and
20 decide what is most appropriate, I'd say.

21 Q. Neither you nor any party that you're aware
22 of have provided any specific framework that would
23 increase existing financial assurance to account for
24 these enumerated risks?

25 A. So I'm not aware of that. I will say that

1 the Groundwater Protection Council is modifying the
2 risk-based data management system for idle and orphan
3 wells to account for some of these kind of risks,
4 including the things in there, and have been working
5 with different state oil and gas and other agencies in
6 that. But they're just starting that process now.

7 Q. At page 87 of your rebuttal, you are
8 responding to applicant's financial assurance
9 recommendations. You register concern with any
10 increases in paperwork or administrative processes,
11 stating that OCD is already inundated with
12 documentation; is that right? Does that sound right?

13 A. What lines on page 87.

14 Q. It starts at line 2001 and goes to 2002 on
15 page 87.

16 A. Yes.

17 Q. And then on page 13 of your rebuttal, you
18 state that the Commission should reject arbitrary
19 volumetric cutoffs in favor of a case-by-case
20 assessment that accounts for market conditions,
21 reservoir characteristics, and long term field of
22 development strategies. Does that sound right?

23 A. Could you ask that again.

24 Q. Yeah. On page 13 of your rebuttal, you
25 state that the Commission should reject arbitrary

1 volumetric cutoffs in favor of a case-by-case
2 assessment that accounts for market conditions,
3 reservoir characteristics, and long term field
4 development strategies.

5 A. Yes.

6 Q. How do you square your recommendation to
7 assess the risk by considering operator compliance
8 history, well-condition, asset maturity and
9 demonstrated plugging costs, as well as making a
10 case-by-case assessment that accounts for market
11 conditions, reservoir characteristics, and long term
12 field development strategies, while also avoiding
13 paperwork and administrative processes to OCD?

14 A. So that's an interesting question, and I
15 think kind of goes to part of what I was talking
16 about. Because OCD already has a lot going on,
17 industry has a lot going on. And I think what we're
18 seeing on an overall perspective is that having a data
19 management systems, AI, whatever, they can help us
20 with those things.

21 Because what I did, I got to serve as a
22 consulting expert to the DOE, DOI and EPA for the MERC
23 program, looking at well plugging of potentially
24 uneconomic marginal wells and idle wells.

25 And what we did and what I helped them

1 with, is they came up with -- and I worked with them
2 as well at the U.S. Geological Survey on a program to
3 actually assess risk based on a lot of those things
4 that you're talking about. They also include wells
5 that have had mechanical failures in the area and so
6 forth.

7 So we have a lot of data that we don't
8 necessarily always use. And it can include things
9 like well depth and production in the area and
10 mechanical integrity failures and non-compliance and
11 all those different things.

12 And I will say that DOE has come up with
13 an app that goes in that direction, but I would say
14 it's like version 1.0. So there is work in doing
15 exactly what you're talking about, but it's -- you
16 know, if you really look at this effort of where
17 orphan wells, let's say, or even the inactive idle
18 marginal wells that have gotten so much attention, all
19 of this has really happened, I would say, just in the
20 last short few years.

21 And there also winds up being a lot of
22 mischaracterization, like we saw with some of the
23 public comment, in reviewing some of the liabilities
24 when a lot of those wells being plugged are old wells,
25 you know, with operators long gone and things were

1 very different and there were different rules and
2 regulations and so forth.

3 So I think we've got work to do. I
4 think that just based on my discussion with NMOGA,
5 they would be very open to working with, you know, OCC
6 and OCD on trying to develop and refine things that
7 made sense there. My guess is that between the
8 federal government, State of New Mexico, DOE, IOGCC,
9 GWPC, you know, and so forth, and even EDF and WELC
10 and whatever, that there could be a lot of really good
11 stuff happen.

12 And I would sure rather see us launch
13 some great things so that we can control contamination
14 and emissions and all those things in a more healthy
15 manner that isn't just, oh, yeah, we're going to run a
16 bunch of companies out of business because they're
17 small. Like, I'm a big believer in small businesses
18 and so forth.

19 Q. Yeah. Neither you nor NMOGA has offered any
20 specific recommendation for how a case-by-case
21 financial assurance framework would work; is that
22 correct?

23 A. I wasn't asked to do that. I don't know if
24 NMOGA has done that.

25 Q. You haven't done that before?

1 A. I have not done that.

2 Q. Throughout your testimony, you raised
3 concern that the definition of marginal well and the
4 presumption of no beneficial use will result in
5 premature plugging of wells; is that correct?

6 A. Yes.

7 Q. For example, page 4 of your direct, you
8 state that this approach would disproportionately
9 impact smaller operators and those with large
10 portfolios of marginal or inactive wells, potentially
11 accelerating the premature abandonment of wells that
12 remain economically viable. Does that sound correct?

13 A. I'm trying to find that.

14 Q. I'm not going to hold you to the exact
15 language, but that's at line 75.

16 A. Yes.

17 Q. And at page 13 of your direct, you state
18 that the 90-day criteria and WELC's proposed
19 presumption will likely lead to the premature plugging
20 of viable wells contrary to the Commission and
21 Division's mandate to prevent waste and protect
22 correlative rights; is that correct?

23 A. Yes.

24 Q. And that's something sort of consistently
25 that you raised in your testimony is this idea of

1 premature plugging?

2 A. I very much understand the need to hold
3 industry accountable to maintain compliance for OCD to
4 address bad actors when they have them. They have
5 rules now that they could be enforcing that I don't
6 necessarily always see.

7 But within this, yes, that's an issue.
8 But we have, I would say, a similar responsibility to
9 make sure that we don't do things that create waste.
10 These resources are critical. They're critical to
11 New Mexico's future, and so we want them to develop
12 responsibly.

13 HEARING OFFICER ORTH: Mr. Tisdell, you have
14 five minutes.

15 MR. TISDELL: Thank you, Madam Hearing
16 Officer.

17 BY MR. TISDELL:

18 Q. At page 113, going into 114 of your
19 rebuttal, you state that proposed changes risk forcing
20 premature plugging of wells that serve important rules
21 in lease management, reservoir balancing and future
22 recovery; is that correct?

23 A. Reservoir management or candidacy for
24 re-completion or refractures. So, yes.

25 Q. And these other purposes of a well, lease

1 management, reservoir balancing and future recovery,
2 are consistently raised throughout your testimony as
3 reasons for not plugging a well that is no longer
4 producing; is that correct?

5 A. Yes. And those are examples, so not an
6 exhausted list.

7 Q. Sure. I want to talk quickly about lease
8 management. So I understand this is where a well that
9 is either not producing or producing a very small
10 amount, and for purposes of the presumption of no
11 beneficial use, that would be less than 0.25 BOE per
12 day could nevertheless hold that lease or unit, if
13 there was a unit, to keep that lease from expiring.
14 Does that sound right?

15 A. That's correct. But even a well producing
16 .25 barrels a day, on an overall lease production
17 could be significant. And I've seen cases where you
18 had wells that were holding a lease, producing a small
19 amount of production, so that the operator could get
20 investors and funding to be able to do a bigger
21 project like an EOR project.

22 Q. But even inactive wells, you've stated in
23 your testimony, could still serve a purpose to hold
24 that lease or unit?

25 A. Yes. As operators look to alternate zones

1 or potential re-completions or whatever, yes.

2 Q. So that whole lease or even an entire unit
3 wouldn't be producing oil or gas. But according to
4 your testimony, such a well still has a beneficial
5 use; is that correct?

6 A. Yes.

7 Q. Can you explain how tying up that lease or
8 unit in non-production for perhaps years would serve
9 OCD's mandate to prevent waste.

10 A. So once those wells are plugged, let's say,
11 oftentimes those resources are lost forever. So
12 imagine if you have those resources underground and
13 you have this well that has access that allows you to
14 do logging, geophysical logging, or perforating, or
15 testing, or whatever that is, as you're evaluating
16 perhaps a lease, an area, a region, basin, or various
17 different things. Sometimes that can take a long time
18 to do. And having that access there can be critical.
19 I've seen it. And once you give up on that well and
20 you plug it, it's over.

21 So, yes, somebody could come in and say,
22 drill a new well, but now they're having to deal with
23 more speculation than they may have had had they had
24 access to that well so that they could do, like I
25 said, geophysical logging, or sidewalk coring or

1 whatever.

2 MR. TISDEL: Okay. Thank you, Mr. Arthur.
3 I appreciate your testimony. No further questions.

4 HEARING OFFICER ORTH: Thank you,
5 Mr. Tisdell. All right. We'll break for the night.
6 Resume it at 9:00 in the morning with public comment
7 and continuing examination of Mr. Arthur. Goodnight.

8 (Proceedings adjourned at 5:00 p.m.)

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1 AFFIRMATION OF COMPLETION OF TRANSCRIPT

2
3 I, Kelli Gallegos, DO HEREBY AFFIRM on
4 October 28, 2025, a hearing of the New Mexico Oil
5 Conservation Commission was taken before me via video
6 conference.

7 I FURTHER AFFIRM that I did report in
8 stenographic shorthand the proceedings as set forth
9 herein, and the foregoing is a true and correct
10 transcript of the proceedings to the best of my
11 ability.

12 I FURTHER AFFIRM that I am neither employed
13 by nor related to any of the parties in this matter
14 and that I have no interest in the final disposition
15 of this matter.

16 

17 Kelli Gallegos

VERITEXT LEGAL SOLUTIONS

18 500 Fourth Street, NW, Suite 105

Albuquerque, New Mexico 87102

&	10,000 89:17	121 4:11	195:25 196:16
& 2:21 3:3,4	232:3	1220 1:6 2:10	197:11,13,21
167:4	100 41:5 57:6	125 3:14	197:23 199:1,5
0	102:5,8,9	12:04 135:7	201:4,16,20
0.166667 98:3	149:13 193:15	13 19:13 97:13	202:13 215:8
0.25 264:6	196:14 202:24	122:4 168:21	215:11 216:4
285:11	202:25 228:20	228:3 279:17	216:24 227:21
0producing	229:3 231:24	279:24 283:17	251:12
149:23	240:16 241:21	136 4:12	155 4:14
1	248:18 257:15	14 28:17	158 4:14
1 41:11,18 70:2	257:19 265:8	156:25 181:21	159 4:15
70:18,19 84:17	276:5	1400 271:3	16 152:8 183:2
98:2 99:3	105 288:18	146 4:13,20	243:21
123:12 126:20	109 4:9	149 4:13	160,000 248:13
155:2	10:34 78:2	15 4:7 17:1	163 4:15
1,000 3:4 42:11	10:50 78:2	19:12 29:10,18	163,000 275:14
47:16 49:4	11 179:15	43:24 49:19	167 4:5
59:6 60:7	202:24	53:9 56:12,22	17 29:25
92:11 105:14	111 4:9 272:18	58:18 72:23	175 4:17
121:24 190:20	113 284:18	77:24 78:1	18 30:20 87:1
190:25 191:12	114 4:10	96:15 104:14	187:21
232:2 251:12	284:18	104:22 105:2	180 47:17
1,975 92:8	116 4:10	105:19 106:1,6	83:19 92:12
1.0. 281:14	1161 69:12	106:6,11 122:4	121:24 150:16
1.6 242:3	11:00 78:1	133:5,6,7,10	190:20
248:22,23	12 34:5 128:11	156:20 168:21	19 31:10
249:12 271:25	128:12 129:7	182:14 199:4	185:16 204:11
10 2:16 43:24	179:19 182:21	215:10 228:2	19.15.2 1:10
72:23 127:25	184:2 190:22	150 56:8	19.15.2.7 17:25
136:15 141:23	198:16 227:19	185:25	19.15.2.7b
174:11 178:19	243:20 244:19	150,000 12:10	260:25
202:24 238:17	261:21 263:3	12:20 24:22	19.15.25 1:10
264:16	264:17	56:14 63:16	34:5 188:13
	1200 232:2	64:20 123:18	227:18
		177:8 192:14	

19.15.25.12 62:14 137:11 155:25 19.15.25.12. 36:24 38:5 19.15.25.13 62:13 71:12 137:23 155:24 156:25 19.15.25.14 62:14 138:2 19.15.25.14. 155:25 19.15.25.8 186:19 19.15.25.8. 31:11 19.15.25.9 45:20 226:13 19.15.25.9. 32:17 33:3 19.15.4. 139:23 19.15.5 1:10 19.15.5.9. 19:7 19.15.5.9a 207:16 19.15.8 1:10 241:1 19.15.8.9 20:6 25:14 63:9 65:20 71:1 19.15.8.9.g 69:17 19.15.8.9a 199:16	19.15.8.9c 69:22 70:10,22 19.15.8.9e 62:15 19.15.8.9f. 200:16 19.15.8.9g 69:25 19.15.9 1:10 209:23 19.15.9.8 28:11 45:16 19.15.9.8c 109:13 19.15.9.9 30:2 45:19 19.15.9.9. 29:10 1900s 235:3 1901 228:16 1905 232:18 1925 232:18 1928 266:11 1950s 230:20 1956 194:9 1980s 228:9 267:22 1982 276:23 1:05 135:6,7 1st 1:5	121:19 123:11 126:21 137:6 159:13 175:14 225:18 2,500 165:21 176:1 257:15 2.3 48:15 49:9 59:7 2.5 48:15 20 77:24 129:1 186:17 232:24 20,000 202:2 2000 10:9 2000s 143:21 2001 279:14 2002 279:14 2009 164:18 2010 164:18 235:7 2011 10:13 2012 142:5 2013 142:5 2014 142:7 2015 11:3 142:7 164:18 2016 164:19 2019 86:9,13 204:17 2020 41:24 86:9,15 87:1 87:14 97:2 204:11 2021 87:2,14 89:17 90:14 97:21 152:18	2022 86:8 89:18 90:14 91:15,19 204:11 2023 89:18 98:1 2024 83:12 89:22 92:7,8 92:12 97:21 98:2 149:14 151:10 152:4,5 152:8 195:13 232:2 2025 1:14 97:2 99:23 143:22 152:7,9 288:4 2028 101:16 123:12 199:3 203 99:25 21 32:16 144:20 186:22 213 3:14 22 56:17 130:3 187:14 2208 2:21 223 86:13 23 56:17 188:9 238 4:21 24 97:24 188:18 24683 5:6 238:21 25 28:18 71:11 130:17 155:1 160:4 189:2
	2		
	2 2:4 30:6,14 30:18,18,22,22 31:8 69:22 70:10,12,13,14 70:22 71:2		

[25 - 70-2-14]

210:6,13 211:2 211:23 260:2 261:15 285:16 25,000 196:11 202:23 25.13 189:3 250,000 25:20 66:23 67:7,12 67:14,15,20 68:18 69:15 70:4,25 71:3,7 196:13,17 202:24 276:4 255 4:17 26 131:20 189:11 257:4 267 99:24 27 189:21 257:6 28 1:14 38:22 189:21 190:2 288:4 288 4:23 28943 288:16 2:00 174:12 2:10 174:12 2h 96:15,20	105:20,25 106:12 125:11 125:11,13 129:3,5 183:10 187:2,6 190:17 208:17 214:14 227:19 3000 271:4 31 191:17 32 91:16 192:9 33 193:1 34 136:22 151:14 35 42:21 89:11 194:5 36 176:7 257:8 37 195:20 38 195:23 3:35 238:19 3h 42:21 89:11	45 144:18 151:9 178:2 199:14 46 200:14 272:12 47 200:24 267:21 276:20 49 139:10 144:6 195:14 202:15 4:00 11:13 14:9 238:18,19 4q 97:13 4th 3:4	52 205:3 53 206:9 54 207:14 55 272:17 57 209:13 58 209:22 5:00 287:8
		5	6
		5 4:3 11:15 72:23 76:15,20 109:13 122:3 126:7,25 141:7 244:4 253:24 268:25 269:1 50 10:21 52:25 55:14,14 229:25 233:3 50,000 66:13,25 67:11,18 68:18 202:24 500 3:4 37:12 37:17 57:6 76:18 102:7 288:18 50s 231:10 51 48:14 53:9 53:11 204:6	6 49:8 59:8 122:16 126:7 126:25 142:13 187:21 267:22 6,000 194:4 6,500 252:3 60 19:22 20:2 52:25 55:14,14 55:23 60,000 169:22 600 80:24 81:2 61 4:8 210:17 62 69:12 63 212:1 64 212:12 65 213:7 66 213:7 272:13 68 8:1 214:17
3	4		7
3 31:1,2 121:6 125:10 126:21 129:16 138:10 151:15 3,650 265:1 30 31:19,23 58:18 59:4	4 126:22 140:10 283:7 4,000 202:9 4,400 241:24 40 55:14,23 141:13,14 197:7 409 2:4 40s 10:21 41 197:16 42 198:9 43 86:14 198:21		7 121:10 260:25 7,000 87:2 7.4 195:14 70-2-14 66:8

[700 - absolutely]

700 241:23 271:3,25 700,000 248:14 72 70:20 152:17 75 218:12 283:15 750 49:8,13 59:6 60:3,7 105:14 121:23 122:23 190:25 225:18 78 4:20 79 4:8	127:14 161:10 90 31:19,23 83:12,12 147:25 149:13 150:17 182:21 182:22 183:24 184:24 185:8 186:10 187:2 214:13,14 227:18 261:22 261:23 263:1,8 263:11,25 264:5 265:4 277:14,19,24 283:18 90233 3:10 95 201:22 267:3 98.5 164:15 99 147:25 148:2,2 99.5 147:22	137:10 138:8 140:12 141:8 142:23 144:7 144:16 145:1 146:6 155:23 177:4 186:24 187:16 197:10 218:19 220:1,6 220:10 232:20 240:18,19 241:22 242:13 248:20 249:1 266:19 267:7 abandoning 31:19 205:23 211:18 abandonment 17:6 23:23 25:23 62:1,9 62:10,12 63:14 65:1,23 66:4 67:23 71:10,13 73:14,17 137:13 138:5 138:12,23 142:14 143:4 143:15 155:21 155:21 156:15 156:23 157:6,8 158:18 177:6 178:16 186:20 187:4,19 188:11,20 190:4,5 197:20 204:14 219:15	222:24 223:5 223:18,20 224:3,12,24 260:3,6,10,15 269:12,17 283:11 abandonments 24:1 abcs 175:11 ability 13:17 28:24 164:23 165:7 265:11 288:11 able 23:2 40:12 40:18 45:9 87:19 94:17 100:17 102:21 112:18 116:14 145:12 147:9 150:24 159:24 164:24 165:7 165:10 169:4 169:17 185:1 202:8 203:25 228:19 234:25 268:18 270:10 285:20 above 43:6 67:5 abroad 14:19 absolutely 36:21 38:14 52:4 113:20 119:18 125:4,6 191:9 192:20
8			
8 123:8 127:13 176:18 262:24 80 8:22 141:15 222:2 240:21 80s 231:1 84 252:2 85 226:4 86 227:15 87 279:7,13,15 87102 3:5 288:18 87199 3:10 87501 2:4 3:14 87504 2:22 87505 2:11 88202 2:16	a a.m. 5:1 78:2 250:3 255:9 aaron 2:23 14:21 135:12 abandon 72:14 73:16 113:6 221:3 266:3 abandoned 62:2 63:7,10 64:15 65:21,25 66:3,11,17 67:17,19 137:8		
9			
9 41:10,18 84:17 127:13			

[absolutely - address]

197:4 226:1 227:12 246:21 abstract 191:24 214:25 abuse 19:16 31:24 76:8 126:9,16 129:19 abusers 129:24 accelerating 283:11 accepted 28:5 29:7,15 access 187:25 188:3 203:20 286:13,18,24 accomplish 106:25 accordance 62:12 155:24 157:8 account 165:4 165:9 184:7 186:6 207:1 237:21 273:1 278:23 279:3 accountability 13:19 accountable 27:10,15 221:12 252:21 284:3 accounting 201:8	accounts 279:20 280:2 280:10 accurate 39:14 48:17 90:1 171:16 acknowledges 219:9 acloutier 2:17 acquire 209:4 acquisition 199:19 203:15 203:22 acquisitions 201:9 217:3 acre 141:13,14 141:15,23 acronym 54:6 act 223:13 230:23 258:8 275:5 action 85:3,17 187:2 actions 247:8 active 16:21 17:3 54:19 56:20,21 58:21 64:15 69:16,20 69:22 70:4,9 71:3 196:5,8 196:14,15,18 197:15 198:2 199:7 220:7 276:3	actively 187:18 217:15 actives 58:25 59:2 activities 111:15,18 113:2 181:6 actor 267:1,20 actors 229:3,6 229:8 266:23 284:4 actual 140:6 153:22 173:3 187:19 207:10 216:5 223:11 237:19 274:1 actually 16:7 17:14 20:12 27:24 30:21 43:6,17 73:2 77:23 96:22 139:8 142:6 166:8 173:4 216:1 218:16 218:25 221:24 230:17 252:6 262:22 274:4 281:3 adam 2:22 52:6 add 11:5 23:25 24:12 25:20 30:19 60:17 127:4 190:9 196:19,21 213:15 214:2	214:11,21 253:9 added 30:15 71:21 121:11 140:15 226:19 241:24 242:4 adding 30:7 182:6 190:3,14 194:25 198:18 208:25 210:18 225:8 addition 127:4 173:11 199:18 205:17 additional 22:23,25 24:1 24:12 25:5 44:5 64:2 72:11 84:3 91:10 94:1 101:24 112:24 128:2,7 131:25 132:11 201:4 210:18 213:23 217:22 222:4 241:23 246:23 271:3 additions 138:21 140:14 178:20 additives 234:10 address 28:7,10 90:2 101:17 217:19 234:15
--	--	---	--

[address - agree]

<p>239:10 284:4</p> <p>addressed</p> <p>162:13,15</p> <p>208:23</p> <p>addresses</p> <p>25:12 30:21</p> <p>32:16 34:4</p> <p>36:25</p> <p>addressing</p> <p>34:9 169:18</p> <p>adds 208:5</p> <p>adequate 240:8</p> <p>242:21</p> <p>adequately</p> <p>18:17</p> <p>adjourned</p> <p>287:8</p> <p>adjudicatory</p> <p>139:22</p> <p>adjunct 8:4</p> <p>adjusting 61:22</p> <p>adjustment</p> <p>69:2 71:6</p> <p>adjustments</p> <p>25:21 69:18,24</p> <p>70:5 71:8</p> <p>128:7</p> <p>administrate</p> <p>216:25</p> <p>administrates</p> <p>224:23</p> <p>administration</p> <p>162:13 258:22</p> <p>administrative</p> <p>76:5 92:21</p>	<p>95:21 126:24</p> <p>172:20 183:11</p> <p>224:15 241:2</p> <p>258:9 279:10</p> <p>280:13</p> <p>administrator</p> <p>5:17</p> <p>admission 78:8</p> <p>78:10,14</p> <p>admit 146:13</p> <p>238:4 251:12</p> <p>admitted 4:19</p> <p>78:19,21</p> <p>146:18,19</p> <p>238:11,13</p> <p>adopt 58:13</p> <p>112:23 169:5</p> <p>172:16 173:15</p> <p>188:15 217:11</p> <p>225:16 240:2</p> <p>240:25 243:1</p> <p>249:17</p> <p>adopted 172:18</p> <p>182:1 184:1,6</p> <p>203:8 207:17</p> <p>214:22 225:25</p> <p>242:5 261:1,16</p> <p>adopting 182:1</p> <p>194:20</p> <p>adoption</p> <p>213:22</p> <p>adopts 170:17</p> <p>173:2</p> <p>advance 17:21</p>	<p>advanced 47:4</p> <p>237:19</p> <p>advancements</p> <p>237:7,13,23</p> <p>advancing</p> <p>236:13</p> <p>adversely</p> <p>247:9</p> <p>advocate 240:1</p> <p>278:5</p> <p>affect 53:9 54:3</p> <p>118:3,20</p> <p>207:16 223:19</p> <p>247:9 254:18</p> <p>affected 48:15</p> <p>48:15 123:17</p> <p>affects 118:5</p> <p>affiliated 211:2</p> <p>affirm 5:13</p> <p>6:15 7:22 9:23</p> <p>11:24 15:5</p> <p>136:1 174:19</p> <p>216:11 239:4</p> <p>239:20 241:12</p> <p>243:13 246:6</p> <p>247:23 250:19</p> <p>254:8 288:3,7</p> <p>288:12</p> <p>affirmation</p> <p>288:1</p> <p>affirmative</p> <p>210:20 212:18</p> <p>afford 252:25</p> <p>affording</p> <p>246:16</p>	<p>afraid 254:17</p> <p>afternoon</p> <p>61:10 135:11</p> <p>147:3 155:14</p> <p>163:15,17</p> <p>167:2 175:5</p> <p>241:15 248:3</p> <p>254:2</p> <p>age 206:3</p> <p>236:13</p> <p>agencies</p> <p>269:23 279:5</p> <p>agency 219:18</p> <p>269:21</p> <p>agency's 221:5</p> <p>ages 244:3,5</p> <p>ago 43:23 93:9</p> <p>164:14 266:20</p> <p>agrarkin 2:23</p> <p>agree 22:7 48:8</p> <p>58:13 64:8</p> <p>70:3 71:2,5</p> <p>74:10,12,20</p> <p>75:17 79:14,23</p> <p>84:22 85:12,17</p> <p>86:11,16 87:16</p> <p>89:12,22 90:1</p> <p>90:11,11 91:5</p> <p>91:19 92:9,11</p> <p>92:15 93:2,16</p> <p>94:4,4,11</p> <p>96:16 97:2,15</p> <p>98:2,23 100:2</p> <p>100:14,16</p> <p>101:13,25</p>
--	--	---	--

[agree - amplified]

102:1,10 103:5 104:2,3,16 107:24 108:3 108:15 109:25 110:7,10 123:4 125:18 127:1 130:19 131:3 132:3 148:4 156:21 157:2 161:8 171:20 217:18 229:4 242:18 266:7 267:5 269:17 271:12 272:24 273:5,7 274:7 274:21 275:2,9 275:14 276:14 277:6,18 278:9 agreed 29:22 50:25 92:25 105:19 124:17 128:18 157:2 agreement 36:19 45:10,16 45:18,23 61:18 agreements 50:17 51:3 185:5 203:22 agrees 94:24 95:13 161:5 ahead 7:24 9:25 12:1 15:8 18:11 30:11 32:25 40:3 78:9 87:7	122:20 136:4 160:21 251:17 ai 186:3 236:14 280:19 air 136:14 248:17 249:3,6 249:7,9,11,18 252:2,5 253:12 alaska 204:16 albert 1:21 albuquerque 3:5,10 248:5 288:18 alexander 76:1 158:14 234:16 234:19,21 alexander's 75:19 113:11 126:4 147:8 164:13 alicia 249:23 249:24 250:5 250:17 align 178:12 192:6 196:21 198:19 214:15 215:3 217:6 249:16 277:9 aligned 36:17 36:17 184:3 alike 195:8 alison 11:15,17 11:21 12:3 allege 27:21	alleviate 95:4 95:24 alleviated 95:21 allow 36:15 46:17,18 74:14 74:24 75:7 140:25 145:18 146:5 192:1 224:2 226:23 270:15,22 allowance 74:8 allowed 25:20 46:1,4 95:22 128:9 133:6,12 170:4 273:19 allowing 37:25 69:18 131:16 215:22 allows 6:14 95:2 286:13 alluded 22:16 aloud 69:13 alternate 285:25 alternative 87:21 196:17 197:22 201:18 alternatively 101:19 205:20 alternatives 177:10 196:13 201:11 222:3 227:21 232:5 237:22	altogether 58:8 amazing 139:12 ambiguous 51:4 55:6 amend 64:10 209:15 amending 197:15 amendment 69:17 224:15 amendments 1:10 61:16 62:16 73:24 74:14 155:20 177:5 178:20 226:17 230:23 america 228:13 amount 37:8 67:6 69:16 70:9,25 98:24 113:17 147:19 156:16,20 190:25 191:11 196:12 233:12 260:4,9 265:10 272:22 275:10 276:8,11 285:10,19 amounts 66:12 69:19,21 192:18 207:7 amplified 195:4
--	--	--	--

[ampomah - approach]

ampomah 1:22 4:11,15 120:24 121:1,8 134:1 134:12 159:8,9 159:12,15 163:6 164:1 amuse 175:8 analogy 54:21 analysis 60:7 80:3 82:7,11 82:13,14,24 83:3 91:12 92:22 93:13,13 94:17 118:24 119:5,17,21 122:9 218:15 221:15 222:24 258:21 259:3 analyze 94:1 anderson 10:9 andrew 2:17 ann 2:18 announced 70:1 annual 28:18 29:1,1,2,5 103:5,9,20 211:3 annually 225:18 answer 74:4 90:8 118:9 124:10,24 153:6 157:2	answered 89:9 165:12 anticipate 231:6 anytime 6:22 anyway 250:9 apodaca 5:18 5:20 239:9 apologies 68:6 108:25 apologize 143:19 157:4 162:19 177:23 189:14 app 281:13 apparent 84:23 apparently 5:25 appealable 51:14 appear 259:21 260:20 appears 215:6 appendix 4:21 4:21 238:5,6 238:14,15 applicable 54:15 131:5 161:24 216:12 applicant 29:21 109:14 120:13 124:13 126:3 127:17 131:23 158:15 187:1 219:2,18	220:20 applicant's 16:18 52:6 62:16 69:3 70:18,18,20 75:7 77:1 122:22 123:9 147:8 155:19 178:1 179:4,20 188:10 193:22 196:19 209:15 218:14,17,18 218:22 219:21 219:24 221:4 256:13 265:10 279:8 applicants 2:2 15:20 28:4,18 29:7,15 36:17 36:19 45:6 51:1 52:1 61:11,15,25 63:2 70:3 71:6 71:12,23 73:10 73:25 77:4 114:16 147:5 156:22 164:14 167:25 168:11 170:18 171:10 178:21 179:23 191:19 192:11 194:21 197:15 198:11,25 200:16 201:11 207:18 209:25	215:2 219:7,25 230:12 255:21 258:24 261:1 261:16 application 15:19 55:11 74:13,14 115:21 183:3 183:13 218:14 applied 53:21 56:23 75:21 219:17 applies 64:24 70:1 156:7 199:6 apply 25:18,22 33:11 71:24 73:15 183:11 187:5 229:23 applying 54:25 237:22 259:24 appointed 5:4 appreciate 61:17 114:1 124:11 128:24 163:22,25 165:16 166:17 171:19 219:3 287:3 approach 52:15 54:24 105:24 115:24 196:1 201:15 278:6 283:8
--	--	---	---

[approaches - assisted]

approaches 47:4 215:23	73:14 92:4 132:14 133:17	arizona 243:20	asking 7:5 100:6 106:12
appropriate 24:20 27:14 35:16 49:3 51:11 55:3 58:19,22 59:1 59:6 60:15,23 75:3 93:17 122:2 125:13 131:16 262:14 270:11 278:20	155:23 157:7 159:19 187:3 188:20 189:9 189:19 197:9 212:8 223:17 223:20 269:16	arms 180:23 artesia 243:21 243:22 244:7 244:11 245:2	142:21 148:1 151:6 154:1 156:9 162:23 247:2
appropriately 46:14 52:14	approves 72:13	arthur 4:16,21 172:23 174:13 175:1,5,13,20 176:16,20 177:16 179:14 181:21 184:17 188:8 206:8 228:7 230:11 237:2,25 238:5 238:13 255:12 255:19 287:2,7	aspect 96:1,4 aspects 99:11 assertion 223:22 assertions 171:10 assess 237:16 280:7 281:3 assessing 219:10 268:17 assessment 80:3 120:2 279:20 280:2 280:10 assessments 192:2 asset 192:18 203:22 215:25 278:13 280:8 assets 22:18 145:1 203:25 204:2,19,23 209:6,7 assign 134:23 assigned 225:23 assist 141:2 assisted 256:11
approval 64:2 73:16,20 74:1 74:9,13,22 75:2 131:7 137:25 138:4 184:4 188:23 189:1	approving 74:7 approximately 240:16 arbitrary 224:21 226:21 279:18,25 archaeologist 241:17 area 29:11 51:24 90:16 159:3 230:20 233:16 243:24 244:17 245:14 281:5,9 286:16 areas 16:23 168:23 169:2 192:3 231:20 231:21 235:8 argue 46:18 73:4 87:21 234:25 arguing 235:14 argument 128:5 arguments 21:10 169:15	arthur's 238:5 articulate 87:25 articulated 81:17 artificial 42:23 186:1 arts 244:1 asked 38:1 40:20 43:1 50:15 83:9 93:9 106:11 108:8 114:14 116:8,15 120:8 150:15 157:1 158:12,25 159:16 168:11 168:15 259:17 282:23	

[assoc - awkward]

assoc 2:14 associated 142:11 182:4 205:22 249:9 association 3:3 148:11 167:10 assume 83:10 85:16 90:17 97:7 103:19 150:9 151:7 229:12 262:6 assumed 272:25 assuming 101:20 153:18 assumption 54:1 85:15 265:25 assumptions 236:22 assurance 5:7 16:18,21 24:23 25:6 55:15 58:1 59:25 61:20 62:17 63:16 65:19 66:11,16 67:14 67:24 68:1,14 69:16,18,21,24 70:1,9,24 77:5 101:20 104:16 123:13 168:13 173:8 177:9,11 178:7 190:16 192:14,16,17	195:4,22 196:2 196:5,7,16,18 197:6,12,17,19 198:3,22 199:1 199:21 200:15 200:17,25 201:3,5,17 202:17 203:11 205:11,12,17 206:10 207:17 213:17 214:19 215:9,12,20,22 216:12 217:13 219:12 220:21 221:23 222:5,8 222:8 227:3,6 227:20 238:22 268:5 274:24 275:4,10 276:3 278:23 279:8 282:21 assurances 25:19 36:10 67:8 69:20 168:16 173:5 206:16 240:4,9 assuring 192:23,24 ata 188:25 192:2 214:15 atripp 2:18 attached 16:7 attain 118:21 attempt 20:21 65:8	attempted 204:16 attempting 236:2 attention 281:18 attorney 61:11 147:4 149:8 186:15 187:12 258:3 attorneys 133:22 134:24 167:6 atucker 2:24 audit 216:25 aunt's 252:2 author 256:5 authority 26:13 35:5,15 137:12 138:22 169:3 169:10,13 218:5 219:11 219:14,23 271:2 authorize 29:20 168:15 authorized 27:6 automatic 223:4 224:19 226:21 automatically 224:6 225:2 ava 247:17 248:4	available 8:22 60:18 61:2 93:12 206:6 232:5 256:3 265:14 268:5 272:22 ave 2:4 3:14 average 147:15 147:17 197:13 197:23 213:21 216:19,23 232:3 248:13 275:13,22 276:7 averages 221:5 277:9 avoid 76:8 87:11 123:18 126:8 162:24 213:20 216:13 216:14 262:14 265:12 avoiding 280:12 awaiting 185:25 aware 36:7 75:15 102:17 109:19 129:13 138:6 149:12 149:21 151:8 159:17 272:16 278:21,25 awkward 174:3
---	---	---	---

[b - behalf]

b	backstop	barrels 47:16	237:17 258:7
b 4:20 16:8	205:17	86:13 87:1,2	259:23 271:18
72:9 73:13	bad 21:25 22:1	89:18 92:8	272:25,25
78:11,13,16,21	22:6 40:9	99:25 105:14	273:17 276:2,7
138:22 250:18	172:14 208:8	143:24 149:13	276:9 277:9
bachelor 244:1	229:3,6,8	151:10 165:21	278:5,12,17
bachelor's 10:5	253:2 266:23	194:3,5 228:17	279:2 281:3
back 10:15	267:1,20 284:4	232:24 277:20	282:4
14:12 20:13	bakken 194:5	285:16	basic 207:23
37:19 41:21	194:10 235:8	barriers 207:6	basin 242:11
44:2 57:24	236:3	base 76:11	266:12 286:16
67:22 68:6	balance 164:11	275:16	basis 46:24
73:2 74:17	178:10 272:8	based 28:3,8	63:21 100:1
75:14 78:1,3	balanced 12:11	35:13 44:8	103:5 104:25
79:2 81:21	balancing	48:5,23,24	123:6 127:12
88:16 89:21	284:21 285:1	51:24 52:22	129:13 148:21
90:21 91:15	ballpark 55:22	56:1,11 76:4,6	175:23 195:7
96:25 98:10	bank 276:24	94:10 105:11	203:12 208:17
105:13 122:18	bankrupt	114:13,14,17	216:16 265:19
141:16 144:9	276:19,21,24	118:22 123:7	bates 69:12
144:13 147:18	bankruptcies	126:22 160:2	battery 268:23
148:10 159:10	267:16,24,24	162:10 173:15	bear 242:16
162:20 163:18	bankruptcy	178:7 181:5	246:18
164:15 169:6	107:14 267:9	191:3,20	beatty 3:4
171:11 197:11	267:19 277:1	194:23 196:8	167:4
204:17 209:7	barely 246:16	197:18 201:18	beautiful 8:2
219:5 229:25	bargain 80:12	201:23 202:13	8:25 252:19
230:20 231:9	barnett 235:9	206:18,19	becoming
238:17 239:9	barred 227:5	207:9 209:8	276:16
247:11 262:13	barrel 42:12	213:23 215:13	beginning 7:9
backbone	98:3 190:20	215:23 216:22	23:25 123:11
167:12	228:18 232:23	216:23 217:9	199:5
background	265:7 267:21	217:11 218:3,5	begun 164:19
136:18 176:15	267:23 276:20	222:7,8 224:20	behalf 241:17
181:20		225:9 227:19	248:4,5 255:25

[behavior - bit]

behavior 20:20 42:2 belief 128:7 believe 14:10 18:14,16 24:2 28:21 29:6,9 32:4 34:5 37:10 38:6 49:5 50:4 51:1 51:3 52:16 53:10,19 56:19 57:21 58:10 63:18,20 80:19 84:15 85:5 86:2 89:14 96:17,17 100:20 101:18 102:5 103:7 104:24 114:22 121:14,17 122:14 123:11 123:15 125:7 126:20 128:17 129:17 138:25 140:19 146:11 156:15,17,25 157:15 160:7 160:25 162:11 162:18 191:7 209:17 221:2 225:24 246:21 259:12 261:4 261:24 266:5 268:10	believed 68:11 believer 161:12 282:17 believes 19:2 130:20 beneficial 18:13,15,16,16 32:23 45:21 72:1,12 75:10 75:14 91:11,20 94:25 97:5 122:15 130:11 130:13,16 143:7,11 145:15 153:19 161:1 162:5 168:12 176:25 177:1,2 179:16 179:17,20,21 179:22,23 180:1,2,11,13 180:14 181:5,8 181:23,24 182:7,7,15,20 183:10,21 185:9,17,20 186:4,13 187:9 189:9,18 190:9 196:22 198:20 206:6 213:12 213:13,14 214:3,11 226:5 226:13,20,24 260:19,20 261:6,6,17,20	263:23 265:3 265:12 269:10 269:15 277:23 283:4 285:11 286:4 beneficiaries 165:24 benefit 18:1 43:22 93:25 119:2 139:6 140:23 205:8 218:21 220:3 220:11 259:15 benefited 167:20 244:19 benefits 244:17 best 13:17 27:9 30:4 37:18 80:2 141:25 171:9 180:12 180:20 270:12 288:10 better 13:9 26:18 43:24 48:4 58:4 92:23 94:15 106:1 107:6 110:1,8 124:25 125:23 134:15 178:9 192:6 202:11 205:23 214:15 beyond 181:5 188:25 219:22 220:11	biden 251:16 big 19:20,23 20:2 112:10 115:10 254:25 267:25 282:17 bigger 44:22 205:24 285:20 biggest 165:2 235:22 237:13 bill 101:23 249:13 billion 195:14 195:18 236:6 240:16 242:3 248:22,23 249:13 272:1 billions 103:3,6 103:12,13,14 169:23 249:14 bills 246:16 bio 268:25 269:1 bipartisan 222:19 bit 20:25 27:5 29:24,25 40:6 48:20 53:16 56:24 79:14,18 92:25 96:22 99:6,13 102:4 104:1 123:10 133:19 138:14 139:7,21 141:6 152:4,5 153:2 156:14 164:14
---	---	---	--

[bit - briefly]

182:12 189:4 197:18 198:7 200:18 214:1 252:7 black 73:20 blanket 17:7 24:17 25:2,5 25:18 46:1 64:16,23 66:10 67:7,13 69:16 69:20,21 70:9 70:24 104:11 104:16 105:2 105:20 128:8 155:3 177:10 196:1,12,17 197:12,21,23 200:17 201:3,5 201:11 202:23 207:8 213:20 213:21 216:9 216:11,15,19 216:21,23 217:5 221:2 227:20 268:3 276:2 blessed 244:9 blight 242:14 blip 41:15 blm 180:12 bloom 1:21 4:15 17:12 134:4,5,7 163:9,11,14,21 163:23 166:10	blue 63:3 71:20 94:14 board 191:16 206:25 221:15 228:25 229:23 233:24 266:22 276:1 boe 49:4 59:5 83:12 92:11 121:23 182:22 191:12 225:18 225:18 261:23 264:5,6,16 265:1,4 277:14 277:24 285:11 boes 125:22 bomhoff 250:7 250:17,18,21 250:24 253:20 254:8,11 bond 7:9 17:7 24:17 25:2,5 46:2 64:16,24 128:8 195:25 196:1,17 197:21,23 201:11 207:8 213:21 221:17 227:22 bonded 56:22 bonding 6:25 7:3 12:10,17 13:8,15,20 14:2 17:4,7 24:1,12 58:22	58:25 60:10 64:20 123:18 154:20 155:3,5 196:13 197:1 198:5,11 199:9 200:23 201:8 202:23 203:13 203:15 204:10 204:12,16,23 207:7 215:14 215:23 216:3 216:22,23 217:5,12 227:21,25 241:18 242:6 243:2 247:6,13 248:7,15 249:17 278:5 278:12 bonds 12:19 53:1 55:23 65:13 173:4,4 173:10 201:9 213:20 216:9 216:16,19 221:2 242:22 248:11 268:3 boom 231:7 234:20 235:14 235:20,22,24 237:9,9 251:13 251:23,23,25 252:24 booms 237:14	border 202:7 202:21 bore 153:20 born 10:3 bothers 180:25 bottom 10:21 35:10 81:15 143:21 147:17 bought 79:24 209:6 bouncing 70:15 box 2:16,21 3:10 boy 88:4 250:18 bradfute 3:9,11 bradfutelaw.c... 3:11,12 bradley 97:13 brandon 262:2 breadth 52:18 119:11 break 77:20 78:4 104:1 134:20 174:4,6 174:6,8 238:16 287:5 breaks 244:11 bridge 115:21 180:8 brief 209:24 briefly 22:13 22:16 28:13 52:11 55:18 67:22 111:12
--	---	--	--

113:9 188:18 197:7 bring 71:16 100:17 121:5 153:10 159:10 160:10 161:3,8 165:7 bringing 144:9 144:13 161:11 173:3 brings 193:16 broad 26:20,21 47:1 48:21 57:22 117:11 217:25 224:4 224:25 broader 34:20 48:18 83:1,23 194:17 broke 20:12 252:3 broken 97:25 brought 19:22 42:6 49:6 108:6 129:16 167:25 170:8 171:5 184:16 202:14 212:7 brunt 246:19 bs 136:20 budget 103:9 103:15,20 budgeted 124:5 budgeting 124:8 125:5	budgets 124:3 125:8 buffer 208:4,14 209:19 build 275:19,19 building 1:5 180:8 237:4 245:5 275:19 built 124:11 180:7 bull 243:25 bullet 137:22 bullets 137:10 bump 41:14 74:17 86:8 bunch 35:10 81:18 176:9 256:19 282:16 burden 8:20 12:23 57:15 59:24 92:20,21 93:10 94:3,21 94:22 95:22 120:16 158:20 212:23 216:6 burdened 117:19 burdens 57:22 117:2,12 213:24 burdensome 26:8 29:2 188:24 burned 69:9	business 9:10 14:5 27:13 39:20 44:11 79:19 81:1 82:3,16,18 103:18 113:21 119:22 197:4 198:8 204:15 204:25 207:5,5 210:22 211:6 211:13 212:20 213:2 247:7 252:24 267:17 282:16 businesses 8:2 170:25 282:17 busy 257:18 button 6:13,19 112:10 buy 79:20 buyer 80:11 81:25 219:15 buying 80:4,6 bwenergylaw... 3:6,7	254:6 calculation 49:17,24 calculations 53:24,25 259:7 calculus 92:12 california 10:4 204:10,15 243:19 244:3 268:20 call 15:18 26:15 30:5 37:25 40:2 46:16 82:10 84:17 94:13,14 105:15 166:23 called 11:14 96:20 156:15 156:18,19 calls 30:1 camera 6:13,14 6:19 134:8 cancel 173:10 candidacy 284:23 canyon 96:15 96:24 cap 25:19 66:23,25 67:15 69:15 70:4 71:3,7 158:17 capability 87:15 capable 153:16 182:19 185:9
		c	
		c 2:1 3:1 4:20 7:20 30:6,14 30:18,18,22,22 31:1,2,8 70:2 70:12,13,14,18 70:22 71:1,2 137:1 140:14 146:13,18,19 247:22 250:17	

[capable - certainly]

186:13 261:20 capacity 185:23 186:4 capital 12:21 84:6 118:5 125:5 203:20 218:2 capture 22:25 50:22 107:6 220:18 225:10 captured 22:24 46:1 captures 219:22 car 89:1 carbon 220:18 274:18 carc 244:4 care 94:14 166:10 247:14 careful 9:4 22:2 22:4 44:12,20 46:22 carefully 76:7 126:8 cares 246:12 253:3 carlsbad 243:25 carry 12:12 cascade 224:4 case 14:13,20 24:6 33:9 38:1 38:12 40:9,11 44:8,16 54:24	85:7 119:17,17 120:18 127:12 127:12 128:9 129:12,12 131:6,6 141:4 143:12 161:15 165:8 169:12 172:2 173:13 176:21 192:2,2 211:19 216:16 226:20,20 232:17 235:1 255:11,21 256:18 259:11 259:19,23,25 260:17 263:5 266:25 279:19 279:19 280:1,1 280:10,10 282:20,20 cases 33:20 41:3 93:2 145:25 176:3 228:11 229:5 257:15,19,25 258:2 274:8 285:17 cash 191:23 casing 24:7 84:24 85:4,9 85:12,13,18 88:2 113:23 137:25 142:20 189:10 202:8 269:6	catch 23:3 44:2 130:3 156:13 catching 22:5 categories 47:24 67:6 69:24 93:18,24 97:5 194:11 206:2 231:12 categorize 93:25 120:5 264:14 categorized 17:2 category 16:24 16:25 20:22 21:23 44:13 45:25 48:23 49:20 50:10 53:14 56:13 57:18 58:2,7 58:11 59:13,17 83:15 92:13 94:9,14,21 95:25 100:23 104:6,8,9 105:5 118:11 119:20 120:6 123:18 156:10 194:18 219:12 264:11 caught 44:5 cause 18:22 20:24 32:5 137:17 153:10 153:11 159:18	163:5 245:1 caused 96:22 252:16 causing 38:21 caverns 243:25 cc15 96:20 cease 81:19 cedar 96:15,24 cement 24:7 cementing 137:25 center 2:3 61:12 147:5 255:21 centers 236:14 centric 39:15 cents 250:11,13 253:9 certain 19:21 26:23 61:18 63:1 79:16 93:3 94:14 98:24 105:6 113:17 127:20 147:16,18 156:16,20 168:18,23 260:4 certainly 6:8 121:17 126:18 165:16 198:7 203:10 204:9 211:19 231:6 232:9 234:7 259:14
---	---	--	--

[certainty - citizen]

certainty 32:10 32:11 certificate 4:23 certification 26:11 27:10 28:22 50:14 210:19,20 211:3 212:18 213:24 217:25 222:16 certifications 29:20 211:16 217:22 certified 176:8 certifying 27:4 cetera 137:25 176:4 181:9 chair 1:21 41:20 134:16 134:18,22 166:11,12 167:3 248:3 259:15,20 challenge 192:25 208:18 270:22 challenged 117:1 210:23 challenges 211:10 chamber 12:5,6 13:19 chance 234:4 249:15	chang 1:21 41:20 134:17 134:18,22 166:11,12 259:15,20 change 19:12 19:16,23 22:8 26:1,6 28:15 29:11,19,20 31:2,3,15,17 45:19 50:14 109:20 113:5 123:20 132:5,8 133:14 139:23 142:16 158:21 177:15 186:18 196:18 199:16 200:16 208:12 210:9,12,19 211:13 226:10 229:24,25 243:4 254:14 changed 26:2 27:3 28:21 37:14,16 74:21 123:11 changes 7:1 16:5,13 17:23 20:6 21:19 26:5 28:5 29:16,17 31:6 33:3 37:13,20 109:12 128:13 133:17 137:3 142:10,11	177:3,11,12 187:15,18 188:10,22 189:6,22,24 192:18 200:5 200:15 201:1 202:17 203:8 204:4,8 207:15 209:24 221:23 223:18,19,20 224:13 226:11 241:19 242:6 248:8 284:19 changing 31:18 106:11 214:13 chapter 248:6 characteristics 279:21 280:3 280:11 characterizati... 89:23 218:18 219:25 characterize 89:7 102:25 characterized 189:23 charge 252:23 chart 63:24 75:16 charter 10:16 charts 69:9 chase 84:3 chased 101:2 chasing 35:6	cheaper 221:4 cheaply 206:23 check 28:25 31:14 133:16 cheese 8:3 chemical 234:10 chief 172:3 173:14 257:3 child 7:4 children 244:19 chill 212:16 chino 1:5 choices 117:2 117:13,15 118:19 choose 41:16 193:19 227:9 chooses 31:8 chose 153:18 chosen 203:3 chris 2:12 chris.moander 2:13 christian 246:12 circle 112:4 circumstance 142:24 circumstances 277:4 citizen 245:24 246:11
---	---	--	---

[citizens - commerce]

citizens 9:9 city 245:10,15 claims 221:16 231:14 clarification 25:16 79:6 82:4 clarifications 16:6,13 137:3 189:23,24 clarify 28:9 104:19 clarifying 132:13 clarity 133:23 223:23 224:5 class 197:14 268:25 269:1 classic 42:1 classification 105:9 214:24 classroom 244:4 clean 7:4,12 8:25 9:6 30:5 240:18 241:22 246:22 248:19 249:11,20 252:25 cleaned 241:23 273:22 cleaning 7:8 246:19 cleanup 6:25 7:3 240:13	242:1 247:6 248:23 249:13 252:16 clear 8:17,19 18:2 23:6 24:14 25:22,25 27:7 33:16,24 38:11 42:10 50:4 51:5,10 53:20 74:5,21 74:25 81:4 119:10 130:25 168:2 clearer 27:14 28:2 clearly 51:8 99:18 144:9 click 96:18,25 clicked 86:4 clients 236:4 climate 252:18 close 56:16 closely 36:16 270:23 closes 7:7 closing 203:15 228:6 cloutier 2:17 4:9 111:4,7,9 111:11 114:1,5 158:3,4 club 6:24 248:6 co2 47:3 132:20 220:17 269:2	coal 194:14 code 224:24 241:2 258:9 codifies 224:15 collaborative 173:24 collapse 245:2 collapses 245:9 collapsing 122:14 223:24 colleague 167:5 167:20 collectively 193:6 college 10:18 11:1 244:5 collin 254:1,5 colorado 202:20 204:21 204:25 253:1 column 99:25 combination 49:22 combined 64:1 come 5:9 7:11 27:4 45:16,18 45:23 49:1 58:16 59:5 76:17 77:7 78:1 79:7 81:20 127:11 133:9,10 141:16 147:18 148:5,10 194:10 208:19	223:9 238:17 239:12 253:4 281:12 286:21 comes 176:24 197:11 251:6 266:1 coming 27:2 61:17 131:12 133:15,15 171:21 172:7 182:11 265:24 command 250:8 comment 5:9 5:10,17 7:2 11:12 14:8,11 96:2 126:10 230:16 238:17 238:23 239:8 243:3 249:23 250:2 253:22 255:8 263:19 263:20 281:23 287:6 commentary 259:23 commented 53:7 commenters 238:24,25 comments 5:14 230:12 239:1,7 266:17 commerce 12:5
--	--	---	---

[commercial - compliance]

commercial 269:1	239:4 251:1 279:18,25 283:20 288:5	communities 13:4 242:14 248:25 249:5	company's 107:22,25
commission 1:3 1:20,23 2:9 5:5 5:12,17 16:3 16:17 31:8 40:18 52:3 54:24 58:3,12 76:1 96:20 112:23 115:20 121:14 125:17 127:7,18 128:22 133:23 168:11,15,24 169:3,9,17 170:13,16 171:19 172:11 172:15 173:1 173:15,16,19 176:5 177:20 178:11 181:22 182:8,13,16 194:25 195:21 202:16,22 204:6 205:1,4 206:9 207:12 209:14,24 213:8,9 214:1 214:6,10,12 215:21 216:11 217:5,23 220:25 222:3,6 223:1 225:7 226:8,16 228:7 229:5 234:17	commission's 18:1 176:14 214:4 commissioner 4:11,15,15 17:12 109:6,11 120:24 121:1,8 132:4 134:1,4 134:5,7 155:15 159:8,9,12,15 163:6,9,11,14 163:21,23 166:10 commissioners 10:1 14:15 146:3 167:3 239:25 241:16 248:3 committed 167:15 committee 170:10 218:16 218:25 248:12 258:23 common 95:11 111:15,18 150:22 237:15 247:2 249:16 commonly 249:8 communicati... 37:19	community 10:16,18 244:19 245:14 community's 14:5 companies 12:16 13:14 53:21 54:5 125:8 160:10 166:2 178:24 200:7 204:24 208:17 209:5 244:10,18,22 245:4,13 246:22 247:7 249:13 251:3 254:19 255:4 267:16,25 268:2 274:17 276:19,21 282:16 company 82:21 107:18 109:15 110:2 112:9 155:1 161:22 165:18 166:1 210:5,7 211:6 211:23,23 231:18 232:1 254:15,18 276:23,24	compare 122:22 193:23 compared 201:18 202:17 218:17 comparison 193:17 264:25 competes 13:13 competitive 13:12 complete 43:15 44:4 112:4,20 229:24 232:13 270:5 completed 182:25 completely 8:12 184:10 205:10 253:7 completes 218:10 completion 43:21,21,23 185:25 284:24 288:1 completions 90:20 112:12 223:8 232:22 286:1 complexities 186:6 compliance 19:3 26:24

[compliance - conservation]

27:17,21,22,24 51:9 80:7 106:8,19 128:13 140:7 160:10 161:4,9 178:8 181:11 185:13 187:4 198:1 203:18 208:4,14,18,22 209:6,7,19 210:7,7,20 211:11,25 212:7,7,19,22 212:23 215:24 216:24 217:4 217:14 218:8 222:9 223:3 224:1,4,7,25 227:2,4,10,18 278:12 280:7 281:10 284:3 compliant 51:20 58:11 64:5 209:3,4 211:2 212:2,6 complicated 200:19 complies 24:3 62:13 155:24 157:9 224:16 comply 12:17 components 104:4,20 compound 87:11 108:10	compounding 21:4 comprehensive 13:6 102:14,19 compression 223:9 compromise 121:25 122:25 168:19 computer 10:6 concept 98:20 98:21 concepts 223:25 concern 17:14 23:6,8 25:17 26:20 32:9 34:20 81:17,20 86:17 91:6 106:14,19 117:10 119:10 119:15 129:20 178:25 201:15 254:14 279:9 283:3 concerned 8:11 9:1 90:13 113:14 114:19 166:3 170:5 228:4 concerning 179:25 200:24 201:13 226:4 concerns 17:14 17:23 18:10	20:5 22:10,13 23:20 25:15 33:17 34:8,11 40:7 52:17 81:1,8 95:4,24 100:10 115:16 117:6,20 138:10 139:18 140:1,11 159:18 162:12 168:2,7 172:25 178:19 187:15 191:18 194:25 198:25 199:15 200:25 203:9 204:18 208:12 218:14 226:9 228:11 conclude 148:24 concludes 238:2 conclusions 177:17,19,21 177:24 206:10 228:6 concur 264:1 condition 38:18 108:5 178:9 215:24 278:13 280:8 conditioner 252:3,5 conditions 142:23 187:25	279:20 280:2 280:11 conduct 5:5 conference 288:6 confirms 219:11,13 conflate 269:8 conflict 130:10 confused 51:7 confusion 47:11,14 217:2 consecutive 182:20 190:22 198:16 261:21 consensus 79:16 121:20 126:1 127:22 128:16 consequence 214:4 consequences 12:12 20:24 41:8 144:22 203:19 213:1 217:3 221:22 225:21 226:21 246:25 conservation 1:3 2:9 5:5 13:7 66:15 149:8 158:24 223:13 240:1,2 240:25 288:5
---	---	---	--

[consider - correct]

consider 8:18 9:11,12 123:23 127:12 182:13 183:18 185:14 189:24 200:12 207:12 213:9 215:23 222:4 245:16 248:23 278:12,15 considerable 242:10 consideration 125:17 127:7 171:6 191:5 241:3 considerations 105:7 112:25 considered 7:1 24:12 46:20 171:5 190:22 222:22 272:5 considering 14:4 191:22 205:10 206:3 237:19 265:21 280:7 considers 173:12,18 consistency 224:8 consistent 133:3 226:11 consistently 283:24 285:2	consolidation 204:22 constantly 27:20 37:13 constitute 87:22 constrain 57:25 58:4 constraint 98:19 consultant 234:22 257:20 consulting 10:9 257:4,13 280:22 consumer 25:15 200:22 cont'd 3:1 contagious 17:11 contamination 282:13 contemplated 173:11 context 191:22 206:13 214:25 236:11 267:15 continent 231:19 232:1 continue 41:23 52:1 74:8 146:10 181:2 252:10 continued 10:21 141:2	continuing 20:19 287:7 continuously 32:2,5,7 129:17,19 130:4 187:7 contours 96:10 103:24 107:9 contract 208:16 contractor 8:15 187:22 contradiction 277:18 contrary 187:19 283:20 contribute 193:6 contributed 195:11,14 204:14 contributes 251:7 contributing 13:1 control 5:25 218:4 249:25 282:13 conventional 236:12 conversations 19:1 45:13,14 127:2 convert 139:13	converted 139:11 268:25 converting 223:3 268:21 268:22 converts 224:6 convincing 252:22 cooking 251:21 coordinating 223:8 copy 137:1 coring 286:25 corner 46:23 corporation 109:15 242:21 corporations 7:11 246:19 248:9 correct 16:8,11 20:3 21:16,17 23:12,13 24:17 24:23 25:10,11 28:5 29:8,22 29:23 30:24 31:8,9 33:19 33:20 34:3 35:20,21 37:5 39:9 47:5 48:6 48:9 49:14,15 50:1,22 53:14 53:18 54:13,16 54:17 55:7,17 56:4,15,18,19 59:18,22 60:2
--	---	---	---

[correct - create]

62:3,4,18	264:13 265:4	242:15 248:12	142:9 164:3
63:11,16,17,20	265:13,18	248:13 251:12	165:18 166:1
64:16,21 65:1	266:4 267:7,12	265:20 273:23	court 42:6
65:14 66:23	267:13 268:11	275:7,13,21,22	235:1
67:8 71:14,22	269:14 270:16	276:7,9,11,13	courts 169:14
72:1 73:18,22	270:19 271:6,7	costing 248:14	cover 7:9
74:2,3 75:5	271:14 272:1	costly 23:11	248:11
76:8 77:2,6	272:24 275:3,5	246:23	coverage 201:8
80:8 81:21	276:5,6,8,10	costs 102:16	covered 18:8
84:20,21 85:18	278:6,14	120:11 169:25	23:15 25:2
86:23 87:4	282:22 283:5	201:23 215:25	28:14 60:18
91:22 92:14,22	283:12,22	231:14,20,21	63:9,18,23
94:12 104:23	284:22 285:4	242:1 248:23	65:19 67:25
105:10 107:22	285:15 286:5	251:24 266:17	68:11,13,17
107:23 108:6	288:9	274:1,15 276:1	128:6 216:13
108:16 111:16	correctable	277:8 278:14	covering 70:25
111:23 112:2,3	224:21	280:9	covers 60:16
112:7,13,14,16	correction	council 279:1	71:2 126:24
112:17 113:3,4	66:21	counsel 1:23	covid 90:25
113:7,8,19,24	corrective 85:3	50:13 158:13	252:13 267:21
113:25 114:24	correlative	158:24 262:7	276:20
119:22 120:4	24:21 102:15	count 242:3	cpi 25:18 26:5
120:11 139:23	120:10 283:22	country 176:2	69:2 128:7
139:24 152:10	correspond	260:18 264:20	craft 14:2
154:2 159:21	207:10	counts 217:15	crafted 76:7
159:22 186:13	corroded 269:6	county 176:3	126:8
193:20,21	corrosive	couple 21:9	create 19:23
227:11 230:14	231:24	28:8 52:24	20:21 93:17
255:25 256:1,6	cost 7:9 9:8	58:15 90:2	112:17 179:21
256:7,24 257:5	88:3,3 169:23	105:16 115:12	183:6 187:10
257:9 258:4,5	187:22 195:7	116:9 128:19	217:2 221:24
258:11,25	202:2 206:21	139:2 149:4,11	224:19 227:14
259:4,11,12,25	216:5 221:12	158:8,23 194:2	246:24 247:13
260:16,23	221:16 232:3	course 51:6	249:1 284:9
261:17 264:7	236:6 240:13	99:2 106:4	

[creates - day]

creates 197:24 198:1 208:20 creating 16:24 57:17 94:21 creation 21:23 58:10 creative 237:21 creativity 237:6,12 credibility 236:23 credits 274:18 crisis 169:22 criteria 42:19 46:13 93:5,18 104:22 113:12 182:18 183:24 184:24 185:8 186:10 262:8 263:1,8,15 265:16 283:18 critical 145:11 169:19 170:3 172:25 206:18 225:13 249:6 278:2 284:10 284:10 286:18 critique 172:8 172:9 cross 4:8,8,9,9 4:10,13,13,14 4:17 60:18 61:2,8 78:25 109:2 111:8 114:8 128:6	147:1 149:5 155:12 189:8 189:17 208:5 208:25 209:10 209:20 255:17 crossed 73:12 127:15 130:17 crux 153:25 168:8 210:14 csr 231:17 cumbersome 212:22 curiosity 237:12 current 43:2 48:13 65:7,14 66:5 73:21 74:12 85:20 136:13 137:7 146:7,10 160:3 160:7 183:16 186:23 196:7 197:5 201:23 205:12 211:1 218:4 220:21 228:2 240:14 242:2 260:8 266:9 271:24 272:8 276:2 currently 42:11 80:20 82:22 85:12 86:17 100:12 178:15 197:17 215:14 231:16 244:13	244:15 260:19 260:21 261:11 276:4 cursor 72:16 curtis 247:17 247:18,21,25 248:2,4 249:21 curve 42:3 curves 229:22 229:24 cut 105:25 106:12,13 202:8 cutoffs 279:19 280:1 cycle 124:4 cycles 161:13 161:18 cyfd 10:10	data 24:7 27:23 33:20 35:5,11 35:15,16 36:9 43:3,10 95:7 99:24 122:12 130:1,18 145:9 147:14,21 148:8,12,18,20 148:22 149:19 152:2 158:20 164:13 170:15 180:9 184:14 201:20 236:14 237:17,18 258:20 259:3 278:17 279:2 280:18 281:7 database 112:9 date 125:3 171:24 daughter 244:22 day 5:8 92:12 130:7 143:22 143:24 144:2 165:21 172:15 173:12 183:24 184:24 185:8 186:10 187:6 194:3,5 214:13 214:14 225:18 228:18,21 232:23,24 238:20 250:10 257:24 263:1,8
		d	
		d 4:1 30:14,19 70:2 123:9 239:17 241:10 254:7 dakota 194:1,7 194:9 202:20 damaged 221:17 dan 4:16 172:22 175:1 175:20 dangerous 249:2 dare 46:20	

[day - definition]

263:11 264:6 264:16 283:18 285:12,16 days 19:22 20:2 31:19,19,23,23 41:12 42:16 47:17,18 48:6 48:9,13 83:12 83:19 86:14 91:16 99:25 121:24 129:3,5 134:10 150:16 150:25 151:3 152:8,9,17 182:21 183:10 183:11 187:2,2 190:20 191:14 196:24 214:14 227:18,19 250:25 261:22 262:3,8 263:22 264:1 deadline 122:14 187:2 deadlocks 227:10 deal 229:8 286:22 dealing 185:23 193:1 198:21 212:2 219:24 266:25 deals 28:12 29:11 34:6 184:17 186:17	189:2,12 192:13 203:16 209:22 214:17 dealt 178:22 debt 244:23 decades 172:23 178:23 233:6 260:14 269:5,5 269:5 decide 26:5 27:9 33:14 119:23 129:12 245:17 278:20 decided 43:16 43:22,24 153:19,20 decides 58:12 172:16 deciding 113:1 122:7 decision 27:11 27:12 50:8 105:22 111:22 113:5 145:4,23 146:10 169:17 187:20 218:4 251:2 decisions 19:20 20:18 118:20 124:1 173:21 deck 17:19 declared 267:19 declares 267:9	decline 42:2 213:15 214:2 214:10 229:22 235:18 declines 12:23 declining 144:12 decrease 11:6,8 168:20 deemed 225:25 deep 93:6,19 194:5 defect 85:8,11 85:18 defects 85:13 defer 157:1 deficiencies 138:7 159:17 define 18:20 67:9,10 68:23 157:6 168:11 179:20,23 181:24 193:18 193:19,24 260:24 defined 41:11 64:9 85:20 101:15 105:14 181:6 182:7 184:13 191:21 191:25 223:25 225:20 265:1 defines 219:19 defining 19:2 32:7 42:20	105:8 107:2 222:11 definite 165:8 definitely 60:9 75:17 124:13 127:8 139:5 145:6 150:5 162:7 definition 18:15,22 19:4 19:12 21:12 22:1 33:13 40:22 41:6,12 41:24 42:5 47:12,15,19 48:11 49:4,11 49:21 52:7,8 53:6 56:2 59:5 61:25 62:5 64:10 80:21 103:25 104:5 104:25 105:1,5 105:12 121:16 122:17,22,23 123:3 125:15 125:16 129:23 130:7,11,12 156:21 157:13 160:25 176:25 179:15 180:19 181:15 182:1,2 187:7 190:3,9 190:14,15,18 191:19 192:1 192:10,12
--	---	--	--

[definition - devastated]

<p>193:22 194:20 195:1 196:22 198:18,19 199:11 213:12 213:16 214:2,9 214:18,21,22 214:23 215:2,6 219:8,17,20 223:21,23 224:2,6,13,25 225:8,10,17,23 227:17 236:10 260:21 261:1,5 261:6,8,10 263:23 264:18 264:21 269:11 283:3 definitional 189:22 223:18 225:1 definitions 18:13 52:21,23 155:20 177:7 190:11 194:2 264:19 defy 130:7 degree 10:5 244:1 264:3 delay 123:19 124:11 204:13 delayed 212:24 delays 184:8 203:15 224:17 delete 63:2</p>	<p>deletion 72:9 deletions 62:23 deliver 244:11 244:13 delivered 125:3 delta 93:11 demands 240:10 demographic 54:17 demonstrate 38:13 119:7 142:19 143:12 145:9,15 162:4 162:7 226:24 demonstrated 38:16 215:25 216:16 278:14 280:9 demonstrates 145:14 demonstrating 147:14 189:3 demonstration 71:25 183:15 189:8,17 269:11 demonstrative 238:6 denver 14:21 deny 109:13 211:13 219:14 depend 187:24 254:20</p>	<p>depended 33:8 115:9 254:21 depending 31:7 64:3 125:21 137:19 depends 82:19 82:21 231:22 257:21 268:17 depleted 253:15 dept 2:10 depth 107:25 108:4 178:8 194:4 196:12 281:9 depths 187:24 deputy 168:20 262:2 describe 104:2 136:17 257:14 described 87:21 88:23 117:7 156:11 describing 88:11 262:20 description 48:17 123:9 262:8 263:15 descriptor 106:8,18 deserve 249:11 249:12 designated 57:10</p>	<p>designed 222:18 desperately 11:7 detail 34:22 35:2 55:12,16 127:6 190:6 201:12 213:5 214:1 258:13 details 35:1 99:10,14 157:3 205:15 237:1 237:20 deterioration 252:17 determination 49:25 50:6 95:3 183:4 186:11,12 187:9 determinations 207:17 226:15 determinative 224:10 determine 47:25 49:18 75:3 91:10 94:8 185:9 determined 196:12 215:22 219:14 detering 212:17 devastated 245:11</p>
---	--	--	---

[devastating - discretion]

devastating 199:13	100:23 101:2 104:4 117:2	digital 92:24	disagree 31:21
develop 37:18 44:23 230:24 278:16 282:6 284:11	118:6 141:17 141:20 161:23 161:24 163:1 171:14 176:2	diligence 81:25 82:12,13,14,24 83:3	85:2 110:4,6 123:4 124:18 125:14
developed 228:9 230:23	176:11 184:14 185:13 188:7	dip 164:18	disappointed 10:20
developing 142:1	194:2,7,13 200:11,12	dipped 42:11	discarding 222:15
development 13:4 14:1 22:18 39:16 84:7 170:23 178:13 181:11 184:14 185:4 225:4 279:22 280:4,12	203:4,5 208:17 211:9,15 221:15 223:9 228:1,22 229:16,17,17 229:24 230:21 230:22 231:7 231:10 235:12 257:22 269:8 270:2,9,9 273:20 274:19 275:25 278:18 279:5 281:11 282:1,1 286:17	direct 4:7,12,17 4:21 15:11,24 16:14 78:13 136:8 146:14 175:3,15 176:20,23 177:22 188:9 190:8 203:10 213:5 217:21 218:10 225:19 238:3,4,7,13 255:24 256:2 256:16 258:16 258:19,24 262:13,24 263:25 264:10 278:4,11 283:7 283:17	disclosure 29:5 50:16 210:18 210:25 211:16 218:3
deviations 208:5,15	differently 30:16 39:17 54:3 88:17	direction 281:13	discourage 185:3 203:21 252:23 253:11
dialed 253:23	difficult 91:9 93:14 119:19 125:4 126:12 199:22 216:25 218:20 220:2	directly 34:10 179:5 226:12 234:23	discouraging 218:1
dictionary 180:19	difficulty 111:1	director 27:6 27:13 136:15 136:25 168:20 208:16 262:2	discovered 232:18
diego 243:19	dig 236:25	directors 178:24	discredit 178:5
difference 122:5			discrepancies 219:1
different 29:24 29:25 34:1 40:24 48:22 52:21 53:17 54:6,11,12,18 54:20,24 55:21 70:19 94:2,5 94:20 96:21 97:7,11 100:9			discretion 26:4 27:8 33:5 35:9 35:12 36:3,12 37:25 46:17,18 73:4 127:9 131:17 133:19 137:16 139:1 140:20 142:22 145:10,13,19 146:6 153:9 165:10 178:15 215:21 227:1

[discuss - doing]

<p>discuss 38:8 79:7 128:15 133:22 153:2 195:21 207:14 224:12 230:13 232:4 262:11 discussed 18:25 31:2 37:2 45:17 50:15 55:5 123:10 126:2,3 127:17 127:21,24 131:9 132:2 201:16 discusses 185:16 203:7 discussing 21:22 67:13 68:9 94:13 152:14 discussion 19:13 48:2 94:19 105:13 121:20 124:14 125:10 131:22 154:12 282:4 discussions 20:16 26:18 28:3 45:8,15 46:10 51:9,25 60:22 162:10 184:9 205:21 disease 249:10 disgusted 252:20</p>	<p>dismally 165:19 dismiss 235:23 dismissed 234:19 disparity 274:3 disposition 288:14 disproportion... 12:13 178:6 184:24 283:8 dispute 148:17 149:18 271:8 272:3 disputes 204:23 disputing 151:12 disqualificati... 106:15 disqualify 104:9,10,15,22 disqualifying 105:20 181:15 disrepair 273:12 disruption 185:5 disruptive 178:4 distinct 209:1 223:25 distinction 101:4 distracted 109:1</p>	<p>dives 93:6,19 divestment 204:22 division 13:8 18:18 22:10,14 24:6,8,20,25 28:4 29:2,7,15 32:6 33:11 34:1 35:12 36:10,11,15 37:19 38:1 39:1 45:6,11 46:17,19 47:18 50:25 54:23 57:10,24 64:3 64:5,19 66:15 72:13 74:6 79:13 81:5 88:23 92:17 94:16 109:13 114:16,23 115:20 121:11 126:14 127:3 127:10,11 130:1,23,24 131:1,6,10,16 133:5,9,20 137:17 138:23 138:25 140:7 140:19 142:22 145:10,12,18 146:6,9 149:9 153:9 158:25 162:21 163:4 165:10 168:1</p>	<p>168:17 169:4 172:16 173:19 183:12 242:19 division's 19:13 31:25 35:4 47:11,14 93:25 103:9 129:20 283:21 divisions 82:5 161:22 docket 140:6 dockets 176:1 257:15,21,22 257:23,25 document 131:13 documentation 183:15 188:24 279:12 documented 184:7 documents 131:11 203:15 doe 280:22 281:12 282:8 doi 280:22 doing 6:20 27:4 36:21 42:1 46:14 53:25 54:4 76:14,22 91:13 92:3,4 130:15 131:2 150:21 165:11 165:17 175:7 180:24 202:5</p>
--	---	---	---

[doing - economic]

230:18 232:22 233:17 236:1 236:16 257:4 281:14 dollars 12:20 55:14 169:23 195:19 236:7 249:14 don's 230:4 donations 244:12,21 door 39:25 90:20 double 144:12 150:24 234:12 doug 239:11 douglas 239:17 downhole 42:22 83:16,24 90:3,6,13 91:6 91:8 149:21 150:9,13 downside 117:25 downsides 118:12,25 119:7 downtime 185:23 dozens 248:10 dr 1:22 134:12 164:1 drafted 35:19 71:6 125:2 226:17	dramatically 221:19 drawn 35:18 118:18 drew 111:10 drill 21:6 23:3 23:11 88:6,21 89:5 118:4 141:5 145:3,5 145:7,24 162:3 242:23 248:10 286:22 drilled 182:25 194:8 228:15 228:16 229:17 232:18 266:11 drilling 13:14 22:12,15 117:22 199:19 240:11,13 246:20 251:14 266:1,9,10 drinking 230:23,25 240:21 drive 1:6 2:10 12:23 197:3 198:8 213:2 255:2 driven 224:6 drivers 13:5 driving 265:23 drop 60:8,9 111:22 262:3	dropped 37:15 263:22 dropping 49:8 60:7 235:4 drops 59:7 dry 180:22 due 81:25 82:12,13,13,23 83:3 185:21 214:3 225:20 245:9 dug 170:5 duly 15:10 136:7 175:2 dump 251:3 dumping 253:14 dunes 151:14 duplicative 181:18 duration 170:2 e e 2:1,1 3:1,1 4:1 6:9,10 7:20,20 7:20 9:21 11:22 23:18,18 30:21,22 70:2 135:24,24,24 212:3 239:10 239:18,18 241:10 243:12 246:3,4 254:7 earlier 53:7 99:18 100:2 102:3 140:20	149:16,25 150:15 180:19 183:24 188:3 203:18 212:13 255:19 256:21 261:25 262:25 263:11 268:6 270:24 273:14 early 46:21 73:12 149:25 204:14 235:2,3 244:3 earned 244:1 ease 94:18,18 easier 41:9 easily 13:14 74:24 220:7 224:21 262:9 263:16 east 2:4 eastern 8:4 easy 212:20 218:9 economic 12:12 13:5 14:1 21:3 23:2 76:5 102:25 112:24 122:10 126:23 145:4,24 153:16 170:22 178:10,13 179:6 191:22 192:2 214:25 221:22 251:23 265:22
--	--	--	---

[economically - entire]

<p>economically 116:23 117:1,8 178:4 283:12</p> <p>economics 37:22 39:24 45:1 84:8 112:1 139:15 237:17</p> <p>economies 245:10</p> <p>economy 245:1</p> <p>edf 282:9</p> <p>edit 74:11</p> <p>edits 74:6</p> <p>educated 168:3</p> <p>education 8:9 8:11 10:11,20 11:7 13:3,24 15:22</p> <p>educational 136:18 244:20</p> <p>effect 59:7,11 63:13 112:1 170:20 223:24</p> <p>effective 115:12 172:12</p> <p>effectively 57:15,25 119:16 120:6 179:9 198:14 216:14 226:14</p> <p>effects 21:4 204:7</p> <p>effort 116:13 116:16 281:16</p>	<p>efforts 45:7 102:4 217:16</p> <p>ehs 208:16</p> <p>eight 36:1 75:12 76:12 143:15 144:17 144:19 147:23 148:3,5 164:16 164:21,25 184:10 233:6</p> <p>either 22:23 30:22 57:10 64:1,5 80:4 97:4 103:17 139:11 143:6 144:10 152:8 174:4 177:3 179:4 186:24 250:6 260:5 269:14 271:22 285:9</p> <p>elect 193:24</p> <p>electrical 8:15</p> <p>eligibility 104:10,15 140:11,16</p> <p>eligible 67:15 139:2 140:21 269:16 272:18</p> <p>eliminate 138:20 140:13 216:14</p> <p>eliminating 201:11</p>	<p>elimination 227:19</p> <p>ella 5:21 6:8,23</p> <p>emerick's 206:13</p> <p>emissions 12:22 282:14</p> <p>emnrd.nm.gov 2:12,13</p> <p>empire 275:19</p> <p>employed 15:16,17 136:12 288:12</p> <p>employees 244:10</p> <p>emptied 245:6</p> <p>enables 208:25</p> <p>enacted 101:20</p> <p>encompass 110:2 224:17</p> <p>encourage 55:9 55:10 213:22 219:4 222:7 250:5 270:18</p> <p>ended 8:19 9:13</p> <p>energy 2:10 13:4 167:6,8 167:12,17 234:21,22 236:17 237:7 258:21 268:23</p> <p>enforce 217:1</p> <p>enforceable 178:12</p>	<p>enforcement 13:9,10 181:19 217:7 222:14 224:22 227:10</p> <p>enforcing 284:5</p> <p>engage 82:23</p> <p>engagement 45:6</p> <p>engaging 205:21</p> <p>engine 186:2</p> <p>engineer 15:23 136:21,23,24 176:6,8 180:6 180:6,7 257:3 257:8</p> <p>engineering 8:5 76:4 126:23 136:20 257:13</p> <p>enhanced 132:20 139:3 140:22 141:3,6 141:9,25 142:2 146:2 150:3,7 161:23 222:16</p> <p>enjoyed 243:23 244:17</p> <p>ensure 26:12 164:8 178:11 246:24</p> <p>enters 65:13</p> <p>entire 98:4 119:22 184:11 244:25 286:2</p>
--	--	--	--

[entirely - examined]

<p>entirely 244:12</p> <p>entirety 170:14 243:2</p> <p>entities 53:18 54:11,15,18 55:24 59:14 103:15 209:4 212:22</p> <p>entity 53:22,25 54:3,4,25 55:17,20 56:9 56:11,17,23 102:19 170:24 240:11,12</p> <p>enumerated 278:24</p> <p>environment 7:14 164:9 167:16 171:2 228:8 231:24 254:24</p> <p>environmental 2:3 13:18,23 38:21 61:12 136:23 147:5 185:13 220:5 247:1 251:24 255:20</p> <p>environment... 14:3</p> <p>eog 3:8,13 245:6</p> <p>eogresources.... 3:15</p>	<p>eor 34:21 37:11 46:5,16,19,20 47:1 92:3 140:21 141:5 148:11 164:20 165:1,2,4,6,17 179:12 220:16 270:5 285:21</p> <p>eors 44:24</p> <p>epa 176:10,10 184:4 230:22 267:22 280:22</p> <p>epa's 122:17,22 123:3</p> <p>equal 197:12</p> <p>equated 224:3</p> <p>equipment 181:9 184:12 273:25</p> <p>equivalent 47:17 98:3 149:14 151:10 190:21</p> <p>especially 57:1 88:5,25 132:20 162:16 167:7 197:25 237:16 249:4 251:7 253:7</p> <p>esq 1:24</p> <p>essential 181:11</p> <p>essentially 30:15 177:15 195:25 196:2</p>	<p>200:23 234:19 260:12 265:1 273:24</p> <p>estate 244:14</p> <p>estimated 242:3 272:2 274:15</p> <p>estimates 271:23 272:3</p> <p>estimating 187:22</p> <p>et 137:25 176:4 181:9</p> <p>europe 251:20</p> <p>evaluate 37:12 37:17 120:9</p> <p>evaluates 118:24</p> <p>evaluating 119:6 286:15</p> <p>evaluation 44:8 226:20</p> <p>evening 166:18</p> <p>event 5:15 78:18 85:11 92:21 106:21 146:17 154:25 182:8 214:6,12 238:10 275:1</p> <p>events 187:10 245:14 252:15</p> <p>everhart 3:6 167:5</p> <p>everybody 60:21 134:22</p>	<p>254:23</p> <p>everyone's 43:22</p> <p>evidence 19:15 19:15,24 31:22 31:24 130:18 137:24 173:23 258:23,24</p> <p>exact 283:14</p> <p>exactly 32:12 91:24 99:6 130:22 132:5 156:18,24 160:19,19 162:25 163:3 165:12 267:1 273:11 281:15</p> <p>examination 4:7,8,8,9,9,10 4:10,11,12,13 4:13,14,14,15 4:15,17,17 15:11 61:2,8 78:25 109:2 111:8 114:8 116:6 121:7 136:8 147:1 149:5 155:12 158:10 159:14 163:13 175:3 238:8 255:17 287:7</p> <p>examine 96:10</p> <p>examined 206:15</p>
--	--	--	--

[examiner - experimental]

examiner 109:1 155:11 examining 95:11 107:8 135:13 example 34:21 37:11 41:6 43:15,20 81:12 89:11,13 96:15 97:3 113:16 118:3 148:11 160:4,24 161:16,20 188:2 215:20 229:20 232:8 234:9 265:6 270:6 283:7 examples 40:11 44:17 88:24 97:11 100:9,12 100:17 101:9 112:7 118:15 139:10 141:10 143:14 161:17 179:3 202:13 202:14 235:25 266:20 269:7 273:11 285:5 exceed 67:7 72:11 131:25 132:11 exceeding 263:3 except 126:7	exception 76:2 76:11 277:7 exceptional 277:4 exceptions 126:2 132:1 162:16 202:10 242:23 274:11 274:12 excess 149:12 155:1 excessive 188:23 207:7 exchange 229:5 excited 172:3 exclude 58:7 71:7 excluded 69:23 excludes 69:20 70:4 excluding 50:1 exclusion 181:25 exclusively 59:3 excuse 135:4 141:14 154:14 166:14 267:12 executive 212:16 218:2 exemplar 111:14 exemption 182:24	exemptions 35:7 exhausted 45:24 285:6 exhibit 4:20 16:7,8 70:18 70:19,20 78:8 78:16 137:1 146:13,18,19 exhibits 4:19 4:20 78:11,15 78:19,21 146:15 227:15 238:7 exist 23:1 124:19 142:14 261:11 266:14 266:16 existing 12:17 21:7 63:8 64:24 65:2,12 73:21 108:14 137:9 138:7 142:17 159:17 159:18 177:5 188:10 198:13 205:17,18 209:9 220:17 221:16 242:1 278:23 exists 173:9 179:2 expand 74:4 160:14 168:12 196:20	expanded 198:10,15 203:17 227:16 expansion 223:23 expansive 205:7 expect 150:25 expectation 18:18 expected 57:23 241:24 267:20 expended 101:7 120:9 expenditure 102:11 145:7 expense 89:7 expenses 9:9 expensive 221:8 experience 10:10 15:23 16:2 22:17 83:2,23 88:1 92:16 107:12 161:19 172:23 178:2 191:20 206:19,21 225:9 273:17 experienced 204:4,7 278:19 experiences 98:19 264:2 experimental 269:1
---	---	---	---

[experimenting - fails]

experimenting 113:7 expert 21:11 147:8 173:3 176:1,10 182:11 198:6 200:20,20 201:12 210:23 210:24 227:23 227:25 229:4 229:15 257:14 258:6,12 269:22 280:22 expert's 234:16 expertise 257:1 259:24 experts 172:5 175:24 205:15 234:6 250:12 expiration 73:13 224:25 expired 61:20 62:1,1,9,10,18 63:6,7,14,25 64:8,12 67:22 67:25 68:2,10 68:11,13,21,24 155:20,21 156:14,22 157:6 190:4,4 197:10 224:12 224:13 expiring 285:13	explain 16:16 19:10 22:12 23:19 25:14 38:15 39:11 48:23 52:17 60:4 96:5 98:11 116:21 117:6,20,21,23 117:25 118:22 119:15 133:2 139:25 181:22 189:13 192:21 201:17 210:16 217:9,23 286:7 explained 205:13 explains 18:17 39:5 explanation 139:25 152:15 explicit 130:24 explicitly 66:22 68:15 70:11 77:3 127:24 exploration 224:3 exploring 153:2 exponential 236:14 exponentially 197:1 198:5 199:8 express 254:14	expressed 266:2 expressly 25:4 64:22 69:19 extend 73:17 74:11 137:17 138:23 188:1 264:3 extended 72:10 131:25 132:8 181:4 263:3,12 extending 184:2 extension 35:23 64:7 74:15,17 74:22 132:16 140:2,4 extensions 34:15 36:15 138:12 139:22 154:5 188:25 extensive 176:15 extensively 204:19 258:16 extent 87:1 101:13 116:21 extra 44:5 122:6,12 124:5 124:5 extraction 242:25 extraordinary 277:7	extreme 201:24 extremely 122:24 201:24 extremes 277:11 exxon 228:24 eye 278:19
			f
			f 6:9 23:18 70:2 250:18,18 fa 65:25 66:4 95:25 101:24 104:11,21 105:7,20 face 248:22 faced 227:7 facilities 79:21 79:24 80:4 212:6 facility 80:6 82:15 83:4 fact 18:7,11 80:25 153:15 207:1 233:21 256:18 factor 181:15 factors 75:20 115:17 139:14 178:8 185:22 220:23 failing 226:21 237:21 fails 206:20 216:4

[failures - financial]

failures 281:5 281:10 fair 60:6 114:17 151:13 155:6 171:15 186:16 fairness 240:10 faith 208:20 fall 55:25 56:12 56:12 80:20 85:19 92:13 100:13 101:14 130:8 225:12 227:3 fallen 97:3,9 232:19 falling 100:10 falls 100:3 243:25 familiar 15:19 69:2 75:6,17 75:19 76:9 86:3 98:21 109:10 122:17 144:5 147:7,11 151:11,12,14 154:20,24,25 165:3 256:13 258:8 families 245:16 family 8:6 243:22 244:15 254:21 278:1 famous 154:13	far 13:15 16:23 27:25 41:8 109:22 169:20 205:7 231:12 233:3,21 258:17 275:24 farming 203:22 fast 185:1 202:13 faster 221:4 favor 7:13 279:19 280:1 favorite 96:19 fe 1:7 2:4,11,22 3:14 10:17,24 february 41:24 fed 42:21 federal 26:24 27:17,20 52:8 89:11 97:13 128:14 151:15 173:10 176:3 210:21 211:12 228:9 240:17 241:21 248:19 272:17,19,21 274:8 282:8 federally 232:9 feedback 172:1 172:25 feel 16:22 19:14 19:17 34:19 96:11 126:14 134:15 167:24 168:19 191:14	feels 169:2 feet 194:4 felicia 1:18 5:4 fellow 246:15 felt 11:1 26:4 131:6 female 243:13 245:20 fence 102:24 fenoglio 5:21 5:22 6:2,4,8,9 6:17,19,23,24 fewer 13:3 field 22:22 39:16 98:16 141:21 181:11 184:11,13 218:23 220:13 259:24 279:21 280:3,12 fields 242:11 242:11 fifth 113:14 216:18 figures 242:6 file 84:23 91:7 91:8 176:20 filed 15:19 16:10 171:18 171:22 255:24 256:16,17 files 92:20 93:6 filings 92:18 223:5	final 25:12 51:13,14 52:1 52:2,2 58:2 128:22 210:15 217:21 228:5 288:14 finally 13:11 138:2 173:18 249:16 253:16 finance 170:10 218:16,25 248:12 258:23 financial 5:6 12:23 16:18,21 24:23 25:6,18 55:14 58:1 59:23,24 61:19 62:17 63:15 65:18 66:11,16 67:8,14,23,25 68:13 69:16,18 69:20,21,23 70:1,9,24 77:5 94:2,22 101:20 104:16 108:5 123:13 168:13 168:16 173:5,8 177:9,11 178:7 183:14 190:16 192:13,16,17 193:10 195:4 195:22 196:2,4 196:7,16,18 197:6,12,16,17 197:19 198:3
--	---	--	--

[financial - forcing]

198:22 199:1 199:21 200:15 200:17,25 201:3,4,16 202:16 203:11 205:11,12,17 206:10,15 207:16 213:17 214:19 215:8 215:20,22 216:12 217:12 219:12 220:21 221:23 222:5 227:3 238:22 240:4,9 244:9 247:9 249:2 268:5 273:6 274:24 275:4 275:10 276:3 278:23 279:8 282:21 financials 107:22 108:1 find 11:17 125:4 206:16 237:11 268:12 270:14 283:13 finding 96:23 findings 169:16 237:23 fine 30:17,18 153:7 165:14 finished 240:13 fires 188:6	firm 161:12 167:4 230:17 256:10 first 5:11 6:6 9:20 11:20,21 15:3,10 16:24 17:24 21:14 24:16 25:17 61:14 64:14 66:10 67:5 73:3 79:9 84:16 88:10 99:25 111:12 112:5 125:6 126:5 132:14 133:3 135:22 136:7 138:13 166:23 172:22 174:14 175:2 194:8 213:12 228:15 230:15 236:1 239:2,12 239:15,16 240:6 241:7,9 243:10 246:1 247:20 250:15 254:4,5 266:11 268:24 firsthand 242:12 fiscal 83:12 98:4 103:16 149:14 151:10 fit 86:17 112:18	fits 94:8 201:15 205:24 206:22 215:12 229:21 five 34:15,17 34:24 35:8,20 35:22 46:4 57:5 71:25 73:5,5 75:9 89:2 102:8 132:14 133:15 137:15 152:16 152:17 154:10 178:16 184:2,3 214:14 240:16 248:18 263:12 263:21 284:14 fix 84:2 85:13 89:2 fixed 150:12 217:5 flaring 115:11 208:6,21 227:5 flat 144:11 216:2,3 flatten 42:3 flawed 226:14 flexibility 33:4 121:12,16 132:19 160:9 162:12,21 163:4 183:25 192:1 213:19 215:18 219:10 222:9 223:6	flips 228:21 flood 141:13,18 141:19,24 142:7 flooding 47:2 220:16 floods 188:6 floor 1:5 flow 63:24 75:16 191:23 203:20 220:8 221:22 fnr 42:21 89:11 focus 39:8 52:13 72:8 114:18 138:18 167:7 170:4 176:16 focusing 264:5 folks 5:19 6:1 169:11 follow 10:14 73:23 83:14 159:23 following 51:20 follows 15:10 136:7 175:2 foot 101:23 footing 169:3 force 225:2 forced 21:6 44:18,19 57:9 276:25 forcing 284:19
---	--	--	---

[fore - further]

fore 170:9 171:5 forecast 183:15 foreclosing 223:14 foregoing 288:9 foremost 172:5 forest 231:23 forever 69:10 179:1,11 186:3 234:3 286:11 forget 46:12 106:13 forks 194:6,10 form 73:21 85:8 formal 223:4 former 269:22 forming 259:10 259:18 forth 33:22 62:16 76:1 169:6 180:14 181:17 183:2 183:25 184:12 186:20 189:19 197:10 199:25 200:13 203:16 206:5 211:20 225:14 229:5 229:18 234:10 237:16 268:3 268:13 269:24 270:21 271:21	281:6 282:2,9 282:18 288:8 forthcoming 206:14 forward 36:23 68:22 168:4 169:7,15 173:7 173:22,23 193:11 214:7 214:12 229:20 fossil 251:16,18 found 7:12 43:18 100:11 248:12 founder 257:3 founders 10:16 four 5:19 36:14 100:8 133:3 233:4 244:19 fourth 216:8 288:18 fox 2:5,5 61:5 146:23 255:14 frac 233:18,19 233:20 235:5,9 235:10 236:2 fracked 43:17 235:8 236:7 251:3 fracking 231:6 234:20 235:6 235:13,20,24 235:24 236:4 237:8,9 251:15 251:25	fracks 44:6 fraction 248:11 265:3 fracturing 235:2,4 frame 187:6 frames 266:8 framework 13:7 14:2 137:7 173:9 186:23 206:18 206:20 226:16 278:22 282:21 framing 223:24 francis 1:6 2:10 frank 6:10 frankly 204:24 fraud 229:5 frequently 140:22 friends 245:3 froggy 17:11 front 16:2 18:4 18:4 35:14 149:20 169:9 176:4 177:23 191:10 219:4 255:13 271:9 froze 143:17 fuel 181:8 fuels 251:17,18 fulfill 219:15 full 21:22 22:18 22:21 39:16 41:4 133:20	139:1 140:20 fuller 34:22 fully 61:22 fun 43:15 45:14 function 221:2 225:1 functions 181:10 185:11 fund 13:23 167:14 195:15 205:16 221:20 222:17 268:2 272:9,23 fundamental 240:10 funded 232:10 funding 13:3 124:3 285:20 funds 12:21 240:17 241:21 248:19 furnished 199:20 further 23:14 23:17 25:8 31:4,5 32:14 38:2 41:18 61:1 77:11 96:2 116:2 117:2,18 120:20 134:2 134:13 159:5 188:1 287:3 288:7,12
--	---	---	--

[future - glad]

future 22:21 46:20 72:1 75:10 119:24 183:16 188:22 218:21 219:10 220:2,11 225:4 231:8 236:12 241:25 242:4 245:17 248:23 252:17 253:10 271:24 278:3 284:11,21 285:1 fy 195:13 fy24 97:25	99:3,4 103:1 107:14 108:5 111:16 128:14 144:2 167:10 167:13 172:24 173:22 178:13 178:24 180:1 180:17 185:23 185:24 186:6 190:19 193:9 200:6 207:25 208:17 236:15 236:21 237:13 240:4,9,12,18 241:15 242:9 242:19,24 243:2 244:10 244:16,22,24 245:8,18 246:19 247:7 248:9 249:13 251:2,13 252:21 254:15 254:20,21 258:8,10 260:14 269:23 275:5 276:15 277:16 279:5 286:3 gate 47:13,14 gathering 223:8 ged 11:1 general 17:22 44:9 83:14	93:4,20 108:3 111:13 115:24 124:17 125:15 130:23 131:3 139:19 161:5 167:14 176:24 195:15 196:9 206:2 221:9 228:4 237:18 259:24 260:1,3 261:10 262:18 266:13 generalities 237:1 generalized 236:23 generally 17:16 44:25 80:16 81:6 88:1 89:22 110:7 258:12 260:17 264:20 267:14 274:10 generate 217:3 generous 244:21 245:13 geological 130:18 281:2 geologist 176:9 geophysical 130:18 286:14 286:25 geothermal 268:23	getting 87:7 90:21 92:23 101:6 171:25 209:7 273:9 giant 119:20 120:6 252:24 give 10:15 17:22 18:3 19:7 29:14 31:11 34:7,10 36:15 40:21,23 40:24 44:7 45:4,7 65:3 68:20 77:24 132:21 134:19 135:17 137:6 137:12 141:10 143:5 160:8 161:2 163:3 209:23 230:8 235:25 245:14 286:19 given 26:22,23 45:1 47:11,14 51:16,17 57:20 83:19 131:4 154:10 244:18 gives 24:15 121:15 giving 48:3 175:21 213:5 glad 61:17 170:10 184:16 262:16
g			
g 2:22 6:10 9:21 25:14 135:24 239:17 241:10 gains 232:25 gallegos 288:3 288:17 gap 115:21 272:22 273:5 gaps 111:20 gary 9:17,21 10:3 gas 3:3 7:6 8:10 8:13,21,23 9:2 11:5,9 12:15 27:18 54:7 79:20 82:14 83:3 91:16,22 98:2,13,20			

[global - gosh]

global 26:24	213:25 218:7	112:24 113:1,1	274:4 275:18
go 7:24 9:25	229:6 230:3	113:18,18,22	275:19,21
11:1 12:1,21	233:11,18	121:22 125:12	280:16,17
15:8 16:23	237:5 253:1,10	128:2 129:11	282:15 283:14
18:11 20:10,13	258:15 260:5	129:14 133:10	284:18
20:25 21:13	262:12 267:16	134:9,18,20	good 5:3 8:14
24:6 26:17	goal 28:23	141:7,19 143:1	10:1 11:18
30:11 32:19,25	god 242:4	144:1 145:5	12:2 13:21
33:1 34:19	goes 122:7	147:6 151:17	14:14,15 15:13
40:1,3 41:8,9	124:9 143:21	151:20 154:13	18:23 23:16
41:21 43:22	179:15 211:15	155:18 156:13	32:5 60:23
44:2 64:3	279:14 280:15	166:22 169:23	61:10 65:11
70:23 72:7,17	281:13	169:25 171:7	79:2,3,5 96:11
78:5,9 85:25	going 14:18	172:2,8,9,10,17	100:17 109:5
89:1,16 90:22	17:18,19,24	172:22,24	109:16 111:10
97:18 111:4	18:6 20:11	174:7 175:15	114:10,11
113:22 120:2	27:3 34:9	179:3 184:24	122:25 134:7
122:3,20	36:23 37:7,21	184:25 185:3,5	135:11 137:17
123:25 124:1	46:11 47:7	186:3 187:24	147:3 153:10
127:13,14,25	48:12 51:18	198:6 200:4,6	153:11 155:14
128:11 129:1	53:24 54:6	200:8,19,20,21	163:5,15,17
131:20 136:4	56:5 64:2,6	203:12,14,19	166:18 167:2
137:6,14	65:5 66:7 69:5	203:24,25	175:5,7 177:25
138:10 139:6	71:16 75:23	205:1,19 217:2	182:14 183:25
140:10 141:23	76:19 80:11	220:9 221:7,7	208:20 230:7
143:16 144:11	83:7 84:17,24	223:16 227:21	241:15 245:3
148:2 153:1	88:11,25 89:4	229:19 231:21	248:3 254:2
160:21 161:2	89:15,16,17	231:21 233:20	255:22 266:22
161:10,13	90:19 92:1,3	233:21,22	282:10
163:18 175:14	95:9 96:9,18	235:17,18,19	goodness 55:20
176:12,18	96:25 97:1,12	236:24 237:11	66:20
177:24 179:18	97:18 98:15	247:21 251:11	goodnight
189:14 190:6	99:6 100:6,12	254:17 259:2	287:7
200:23 205:14	103:11,22	261:9 262:12	gosh 142:3
206:9 208:1	105:13 112:5	262:14 270:4	

[gotten - harnesses]

<p>gotten 19:5 281:18</p> <p>governing 71:13 240:3</p> <p>government 12:4 170:24 282:8</p> <p>governments 14:1</p> <p>governor's 251:2</p> <p>grace 209:21</p> <p>graduated 10:4 244:23</p> <p>grande 248:6</p> <p>granted 34:15 141:1</p> <p>grants 272:17 272:19,21</p> <p>graph 139:9 143:20 144:15 147:11,14 158:13 159:2 164:17</p> <p>graphics 259:7</p> <p>great 66:14 95:18 153:7 161:16,20 162:1 204:3 245:15 256:5 257:7 260:2 282:13</p> <p>greater 66:12 67:11</p>	<p>greatly 205:8</p> <p>green 62:24 71:17,20 138:17 143:25</p> <p>gregory 1:21</p> <p>grew 243:19</p> <p>grid 252:5</p> <p>ground 95:12 175:23 253:14</p> <p>grounded 191:21 214:24</p> <p>grounds 196:21 198:19</p> <p>groundwater 240:20 249:3 279:1</p> <p>group 102:18</p> <p>groups 232:10</p> <p>grueling 115:12</p> <p>guarantees 113:21</p> <p>guess 21:24 25:17 29:24 32:25 38:22 43:18 110:7 119:15 152:3 156:6,9 282:7</p> <p>guessing 76:16 76:17 83:13</p> <p>guesswork 76:6 113:15,17</p> <p>guidance 33:25 36:14 37:5 58:3 94:16</p>	<p>131:11,13</p> <p>guidelines 8:17</p> <p>guy 228:19 258:14</p> <p>guys 20:8,13 127:19 172:3</p> <p>gwpc 282:9</p> <p>h</p> <p>h 7:20 239:18 243:12 246:4 250:18</p> <p>half 144:19 174:5 228:18 274:15,15,16</p> <p>hall 1:5 4:13 149:2,3,6,8 152:24,25 155:6</p> <p>halliburton 236:3,5,8</p> <p>halo 107:5 118:18</p> <p>hammer 96:9</p> <p>hammered 115:16</p> <p>hand 11:15,16 229:9 253:25</p> <p>handful 230:3</p> <p>handle 64:12 119:24 131:6 246:23</p> <p>handled 88:17 146:7</p> <p>handling 14:22 68:17</p>	<p>hands 33:14</p> <p>happen 21:5 46:24 89:4 90:5 184:15 200:10 208:7 230:25 231:8 246:12 266:7 266:24 268:1 282:11</p> <p>happened 81:13 85:16,21 92:6 100:1 281:19</p> <p>happening 37:24 221:2 253:8</p> <p>happens 13:16 39:25 41:16 51:17 89:3</p> <p>happy 10:2</p> <p>hard 60:22 120:5 124:10 202:12 226:14 251:25</p> <p>harm 12:13 13:21 18:22 32:5 38:21 142:19 247:12</p> <p>harming 249:4</p> <p>harmonize 224:9</p> <p>harms 249:7</p> <p>harness 107:4</p> <p>harnesses 106:2</p>
--	--	--	--

[harroun - high]

harroun 41:10 41:18 84:17	168:17,22 170:7 171:7	158:5,6 159:7 163:9,12	174:12 221:11 238:19 252:21
hart 2:21	190:24 196:24	166:11,13,19	hello 6:2 9:19
hate 207:4 233:10	229:2 256:21 263:10	166:21 167:3 169:7 174:2,10	110:23 247:19 254:3 255:19
hazard 32:8 242:14	hearing 1:1,18 5:3,4,5,8 6:3,5	174:13,18,21 174:23 230:2,6	help 57:25 59:4 112:6 121:17
hazards 247:1	6:12,18,22 7:15,21,24	238:2,9,16,20 238:21 239:19	141:2 167:13 170:16 171:1
he'll 14:22	9:15,19,22,25 11:10,19,23	239:22,23 241:4,11,14	172:10 173:20 200:2 249:24
headquarters 245:5	12:1 14:6,14 15:2 18:21	243:5,16 245:25 246:5,8	256:8 280:19 helped 209:5
health 164:9 242:13 247:9	20:17 51:7 57:9 60:25	247:16,19,23 248:1 250:14	228:10 278:16 280:25
249:4,6 251:8 252:11,13	61:3 72:5 75:12 77:13,19	250:19,22 253:19 254:3	helpful 30:12 45:22 93:17
healthy 282:14	77:25 78:3,6 78:17,22 84:10	255:5,15 257:22 284:13	103:23 123:20 163:20 207:21
hear 6:4 11:18 37:15 40:6	99:5,15,17,21 108:20,25	284:15 287:4 288:4	helping 14:20 161:8 173:7
47:10,21 49:16 52:5 98:6	110:13,23 111:2,7 114:4	hearings 79:3 heat 251:21	233:16 244:11 270:1
110:22 143:17 143:18 171:7	116:3 120:21 120:22 134:4	heated 45:14 heating 251:20	helps 268:2 hesitant 191:9
172:3,22 174:17 262:1,1	134:16 135:2,8 135:12,14,17	heats 252:6 heavily 139:3	hey 76:17 hi 109:5 134:7
262:5,6 263:18 270:24	135:21,25 136:3 140:1	heels 250:25 251:6	135:11 149:7 high 10:17,25
heard 1:17 19:13 21:2	142:5 146:16 146:22 149:1,3	heightened 77:4 198:11	12:11 16:1 29:12 37:7
22:19 31:20 32:3 45:5 49:1	152:24 153:5 154:17 155:5,8	203:11 215:8 held 27:10,15	38:17 39:11 170:5,6 177:25
50:20 57:8 58:18 98:18	155:11 157:17 157:23 158:2,3	34:14 39:6 66:17 78:2	189:15 201:24 205:6 213:11
109:24 114:15 114:18 149:15			
154:22 162:18			

[high - idea]

<p>218:20 220:2 227:16 273:1 273:10 276:22 277:5 higher 9:10 37:3 65:13,25 66:4 203:16 204:12 276:17 277:2 highlight 71:17 226:8 highlighted 62:23 63:3 65:16 66:9 67:5 71:20 74:10 127:14 128:12 highlights 138:17 highly 236:22 277:16 hinder 9:7 hinkle 2:15 hinklelawfir... 2:17,18 hire 10:22 hired 10:9 historic 231:11 historical 212:21 historically 181:4,7 history 26:14 79:25 89:25 90:12 93:20</p>	<p>178:8 215:24 221:1 222:10 235:22 237:14 237:18 251:14 253:14 278:13 280:8 hit 59:16 276:20 hittle 7:18,19 7:20,23,25,25 9:16 hmm 42:8,15 58:5 73:11 84:18 87:10 89:19 104:7 116:19 132:17 hobbs 139:10 141:11 142:4 144:5 150:1 159:2 161:21 164:20 hockey 42:2 hold 7:10 39:6 44:15,21 53:4 73:2 123:21 222:1 229:25 245:25 250:14 250:14 283:14 284:2 285:12 285:23 holding 44:14 285:18 hole 180:22 holland 2:21</p>	<p>hollandhart.c... 2:23,24 hollywood 10:3 home 17:12 hone 115:5 honed 130:14 honest 236:25 honing 49:10 honor 110:21 157:21 167:9 hope 16:21 35:7,7 79:3 92:24 103:24 173:13 228:25 hopeful 253:10 hopefully 59:8 60:22 170:17 206:12 horizontal 47:5 88:18 202:3,4 202:6 207:2 232:16,22 233:2 235:7 236:2,5 horizontally 233:20,21 horizontals 233:9,25 host 83:20 84:7 90:22 hotter 252:1,1 hour 134:22 135:3,5 174:3 228:21</p>	<p>house 231:23 252:6 housekeeping 78:7 houston 136:13 hovey 245:21 245:21,23,23 246:3,4,7,9,10 247:16 249:21 huff 220:17 huge 42:3 193:9 206:23 242:15 hunches 76:6 hundred 42:16 52:24 59:21 111:18 127:1 133:24 176:2 hundreds 248:10 hurdles 139:16 hydraulic 235:2,3 hypothetical 80:14 81:11 105:8 hypothetically 80:23</p>
i			
<p>idea 51:19 143:10 148:20 180:14 260:4 266:13 278:17 283:25</p>			

[identified - inclining]

identified 33:25 147:16 214:9 265:15 identifies 138:3 271:2 identify 68:12 idle 279:2 280:24 281:17 ignore 218:23 ignored 220:24 221:20 222:11 223:10 ignores 185:10 ignoring 51:16 51:21 184:18 184:21 illegible 65:9 illustrate 120:18 imaginal 121:18 imagine 34:23 46:20 81:7 82:1,3 199:23 286:12 immediate 271:10 immensely 246:20 impact 20:2 22:14 48:18,21 48:22 49:8 52:18,22,24 53:17 55:16 81:14 106:4	107:1 117:7,22 120:19 125:1 128:2 170:20 178:6 184:18 184:25 185:17 185:19 192:18 199:13 283:9 impacted 170:25 210:8 impactful 49:10 impacts 96:6 102:14,16 116:23 184:20 194:19 203:7 203:11 204:5 205:7 207:4 212:10 implement 121:16 implementati... 118:1 implemented 204:10 implicated 192:12 implications 195:7 implicit 57:14 implying 93:22 importance 44:11 important 7:10 8:7 39:21,21 42:20 47:24	48:9,10 60:4 101:4 167:22 169:24 170:11 172:13 193:4 215:19 243:4 284:20 importantly 186:9 importing 224:9 impose 24:22 imposes 188:23 impossible 212:15 impractical 140:3 178:3 208:15 improve 40:12 77:8 100:25 101:2 improved 13:10 77:8 232:13 improvement 221:17 inactive 12:11 16:22 19:12 25:23 32:2,7 49:21,25 61:20 62:11,17 66:5 75:8 106:7 129:23 130:4,8 140:17,24 148:6 155:22 156:2,10,16,18	156:19 157:12 160:18 196:20 196:21 197:6,9 197:17,19 198:3,10,18,23 199:5,7 215:10 217:14 220:4 220:11 222:17 226:5,15,18 227:17 229:13 260:4 271:4 281:17 283:10 285:22 inactivity 75:13 148:5 223:4 228:3,3 inadequate 220:22 inadvertently 213:1 inapplicable 231:13 inartfully 101:7 incentive 213:23 217:9 incentives 232:11 incentivize 20:18 incident 220:6 incidental 224:20 inclining 43:7
---	--	--	---

[include - information]

<p>include 50:5 57:8 58:20,24 109:18 116:24 180:4 183:14 243:24 259:6 278:18 281:4,8 included 15:23 30:23 50:9 110:2 128:19 159:1 259:4,21 271:18 includes 13:8 261:19 including 17:3 52:19 73:15 76:2 176:4,7 180:12 193:10 234:10 249:9 257:8 258:21 279:4 inclusion 109:25 181:14 199:8 inclusive 52:9 52:14 57:21 110:8,9 income 13:2 245:12 incomes 246:15 incomplete 92:20 200:17 200:25 201:3 incorporate 192:1 206:17</p>	<p>incorporated 15:17 97:16 increase 11:8 12:10 16:21 58:17 86:25 87:19 92:20 116:10 125:21 151:1 164:22 190:15 195:22 197:1 198:5 199:9 200:23 204:17 247:5 247:13 271:17 278:23 increased 86:23 87:3,3,8 87:8,9 93:10 168:16 177:8 182:4 204:23 231:15 increases 189:10 196:5 196:15 198:22 221:24 222:8 279:10 increasing 125:21 increment 51:18 incremental 185:3 205:8 increments 34:16 73:6 independent 2:14 12:15</p>	<p>102:19 105:7 242:20 259:3 independently 259:6 index 25:15 200:22 india 251:21 indicate 153:15 indicated 5:20 102:5 indirectly 179:5 individual 12:19 129:14 177:8 201:16 215:12,14 227:20 individually 199:2 industrial 8:5 242:13 industries 9:7 industry 8:10 8:13,13,22,24 9:1,7 13:13 14:1 19:19 52:19 57:24 81:6 83:4 102:18,22 103:1 107:13 111:16 112:16 128:3 167:13 169:2,25 170:6 170:17 171:8 171:11,16,24</p>	<p>172:17 173:16 173:22 180:17 180:24 184:22 186:7 195:14 201:22 204:18 208:7 217:6 221:3,6 227:22 227:24 231:4 232:10 236:19 237:7 242:9,15 244:16 245:1,8 245:13,18 251:13 252:14 252:21 254:21 254:22 263:16 267:4 280:17 284:3 industry's 168:22 infeasible 236:6 inflationary 70:5 71:6 influence 13:17 inform 170:16 172:10 173:1 173:20 205:23 information 33:15,18,25 34:2 36:14 37:4 76:5 91:10,12 93:11 93:12,13 94:1 94:10 108:15 126:24 146:8</p>
---	---	---	---

[information - issued]

170:12,15 183:16 258:22 269:13 270:16 270:19,20 informed 169:16 171:25 infrastructure 13:24 139:18 142:10,11 167:12 184:8 184:11 185:11 185:22 186:8 inherent 194:20 inherently 40:17 initial 24:15 26:21 35:19 75:9 79:10,11 141:15 189:1 initially 232:17 injection 139:11,17 144:10 180:3 182:23 198:16 220:12 226:22 231:7 268:25 269:2 innovation 218:23 220:14 input 171:22 insertion 84:6 insight 10:11 181:20	insignificant 195:18 insolvency 204:18 inspection 13:8 instance 29:6 33:19 56:16 91:13 201:10 217:14 232:14 257:24 273:2 274:13 276:18 instances 93:4 institutions 167:18,19 instruments 203:13 insurance 247:6,13 274:25 integrity 24:8 38:13,17 138:3 141:1 142:18 142:20 145:14 159:18 189:4 189:12 224:18 281:10 intend 242:22 intended 33:23 51:13 77:24 209:2 221:3 intent 20:15 22:3 24:24 27:1 45:22 50:16,21 51:4 51:8,15 60:11	72:18 95:19 106:3 115:16 125:19 126:18 128:10 intention 126:25 intentionally 263:2 intentioned 168:1 interconnected 226:7 interest 28:19 210:13 211:2 247:4 288:14 interesting 43:18 280:14 internal 187:22 198:1 203:18 217:4 internet 268:12 interpretation 9:14 169:13 interpretations 169:8 interruption 41:20 intervention 244:4 introduces 181:15 216:24 introducing 181:18 introduction 22:16	introductory 178:1 inundated 279:11 inventory 139:6 140:23 investigation 108:7 investing 12:22 investment 13:13,17,21 218:2 investor 212:16 investors 285:20 invite 7:13 involved 76:18 115:10 139:3 142:5 155:5 171:8,11 273:23 involves 260:2 iogcc 264:21 282:8 ipanm 111:11 124:21 210:22 issue 25:9 38:6 131:13 168:8 178:22 181:2 181:17 192:16 210:4 217:18 218:18 255:1 284:7 issued 173:4 266:10
---	--	---	--

[issues - know]

<p>issues 40:5 83:16,24 84:3 120:1 150:10 150:13,14 153:21 160:3 164:10 168:18 169:18 172:5 172:24 173:11 173:12 176:24 188:3 192:6 201:9 207:12 208:21 218:8 220:20 224:21 issuing 173:5 it'll 18:12 42:2 42:3,3 156:17 198:7</p>	<p>job 120:16 236:5 267:23 jobs 13:3 171:3 235:9 245:12 join 239:12 250:6 255:12 joined 167:5 joining 14:19 jointly 210:23 jordan 3:15,15 juan 194:14 julia 243:7,11 julie 243:18 jumped 175:10 jumping 67:22 68:6 87:7 jurisdiction 212:24 jurisdictions 193:19,23 202:15,18 204:5 justification 38:12 129:4 130:20 justifications 21:19 30:3 31:12 32:18 34:12 35:3 177:19 justify 112:1 130:15 188:22 269:14,15 justin 39:1</p>	<p>k</p> <p>k 2:11 9:21 135:24 239:18 244:4 keep 5:14 8:24 9:5 19:18 59:3 63:23 80:11 121:24 122:4 127:15 129:5 129:22 150:20 201:19 239:6 253:2 285:13 keeping 27:1 30:18 88:16 167:16 183:25 199:11 kelley 14:18 36:8 135:23 136:6,12 kelli 288:3,17 kelly 4:12 kept 166:7 kessler 3:15,15 key 107:16 237:10 kick 59:25 124:23 kids 165:24 kind 18:5 40:4 59:11 76:8 80:3,14,25 81:24 82:7 88:2,22 92:21 95:11 101:24 102:23 104:3</p>	<p>104:17 105:16 115:21 117:24 118:24 119:1,5 126:8 138:17 138:17 151:6 153:1,25 160:13 174:3 175:23 176:16 177:18 194:11 203:2 213:25 230:15 237:3 251:4 252:22 253:6 270:2 273:25 279:3 280:15 know 8:16 26:14 32:6,19 34:8 36:8 41:4 43:5 44:3,18 55:13 57:13 60:4 76:16 77:19 80:7 81:6,18 82:1 82:25 86:21 87:24 90:5,7 90:18 91:13,25 93:10 95:6,7 96:1 97:8 98:9 98:14,14 99:12 99:14 103:17 107:5,10,10,22 110:4 111:6 117:14,21 123:22,24 124:9 125:6,18</p>
<p>j</p>			
<p>j 2:17 6:9 239:18 243:11 jacks 273:25 jacob 3:6 167:5 january 41:24 123:12 jeez 54:2 jennifer 3:11 3:11 jesse 2:11 108:19 jessek.tremaine 2:12 jeverhart 3:7 joan 5:21 6:8 6:23</p>			

[know - language]

125:20 126:19 129:18 130:6 130:19 133:4 135:1 144:15 149:24,25 150:2,12,21,23 153:7,13,21 154:22 156:1 156:12,16,18 156:19 157:3 160:4 161:12 161:13,15,15 161:19 162:6 162:20 164:5 165:1,15,19,22 166:2,3 167:11 169:21,22 170:19 172:7 175:8,8 178:14 180:16 181:8 182:8,18,21,24 183:9,9,15,25 184:2,8,9 185:11 188:4,5 188:21 189:20 189:21 193:14 193:16,25 194:4,8,9 195:9,9,17,18 196:9 197:9 199:17,18 200:20 201:19 201:21,22 202:1,11,13,19 202:20,21,22	202:23,25,25 203:2,12 204:10,10,11 204:22 205:13 205:14 206:2,4 206:13,16 207:8,19 208:2 208:8,13 210:4 210:6,12 211:12,13,19 211:20 212:6 212:24,25 214:3,13,14 217:19 218:6,6 220:13,16 221:14,18 222:11 223:7 223:10,13,15 225:9,9 226:11 226:13 227:24 228:11,13 230:4,16,22 231:1,2,6,12,20 231:20 232:9 232:11,12 233:5,20,22 234:10,11,12 234:12 235:4 235:21,23 236:8,13 237:11 246:13 250:8 251:7,11 251:16,23 252:2,22 253:13,16	254:25 261:4 261:25 262:21 265:6,21,23,24 266:22 269:19 269:19,24,25 270:3,3,4,11 271:22 272:8 273:7,17 274:2 274:5,17 275:17,18,18 275:20 276:12 276:13,25 277:2,8,12,20 278:1,16 281:16,25 282:5,9,23 knowing 152:20 162:20 knowledge 80:2 85:22 102:18 107:25 108:4 149:17 154:11 176:14 known 165:1 218:5 234:4 knows 242:4 kyle 2:6 255:20 I I 3:11 6:9,9,10 7:20,20 11:22 11:22 135:24 135:24 239:17 239:18 241:10 241:10 243:11 243:12 246:3	250:17 254:6,6 labeling 44:14 labels 224:10 lack 219:11,13 236:23 lag 42:25 43:2 43:8 111:22 land 18:21 51:8 60:22 109:7,11 123:4 155:16 164:5 240:1 242:19 246:12 247:10 274:9,9 landing 105:17 landowner 230:18 274:14 landowners 165:23 lands 109:7 155:16 landscape 242:8,15 language 21:14 26:21 32:10 33:23 36:20 46:7,11,14 50:24 51:1,10 52:2 57:24 58:14 63:1,8 65:16 69:19 70:4,6,11 71:21 73:10,20 74:1,12,21,23 96:13 115:18 123:7 126:2
---	--	--	---

[language - likely]

128:18 133:1 182:10 198:14 262:22 283:15 lap 175:10 lapses 224:7 large 65:10 83:5 88:21 167:11 203:24 231:25 236:4 242:21 254:19 255:3 267:2 283:9 largely 44:22 107:17 larger 65:9 69:13 211:6 largest 245:5 251:13,17 larralde 241:7 241:9,10,13,15 241:16 243:6 lasso 117:11 lassoing 44:12 late 166:8 211:24 latest 136:24 launch 282:12 law 2:3 27:18 48:23 61:12 110:3 147:5 167:4 169:12 211:12 255:20 lawrence 7:18 7:19,25	laws 128:14 210:21 lawyer 18:25 58:10 67:10 81:9,12 96:3 110:5 257:19 lawyers 55:9 128:21,23 lay 220:24 lead 113:5 171:17 175:20 175:25 283:19 leader 167:17 leading 76:8 126:9 224:21 249:7 leak 249:3 learned 168:4 169:20 171:24 252:12 lease 39:7 44:16 181:8 221:16 225:14 284:21,25 285:7,12,13,16 285:18,24 286:2,7,16 leasehold 185:4 185:12 191:22 leave 7:11 10:23 26:4 32:1 33:13,13 135:3 222:25 242:8 253:4	leaving 87:20 204:15 249:19 led 204:11,22 237:13 leery 33:6 left 27:8 81:10 118:21 127:10 133:19 138:15 143:23 218:12 248:16 249:12 legal 21:10 45:14 81:8 96:1 110:5 123:7 128:5 169:8,12 187:10 203:14 210:24 258:7 288:17 legislative 170:10 218:15 218:24 248:12 258:22 length 139:1 lengths 144:8 lengthy 174:7 lens 39:15 55:8 164:5,5 lesson 119:15 letting 273:24 level 8:9 16:1 29:12 37:3,7 38:18 39:11 47:25 55:11 92:7 93:20 127:21 177:25	189:15 200:23 205:6,10 213:11 223:15 227:16 244:5 263:15 levels 89:21 215:23 226:22 leverage 209:1 lfc 49:13 191:6 219:1,6,19 221:5 225:16 225:24 270:24 271:1,9,12,18 271:23 272:25 275:12,14,15 275:16 277:8 liabilities 281:23 liability 81:1 81:11,20 109:15,18 110:1 271:24 272:24 lied 107:11 life 20:2 82:6 129:25 173:5 193:14 230:1 254:22 266:3 lift 42:23 186:1 light 263:14 likely 49:10 125:23 152:2 182:2 203:17 208:20 218:1 271:3 283:19
--	---	---	--

[likes - look]

<p>likes 130:24</p> <p>limit 34:13,18 42:12 47:16,17 47:20 57:25 58:4 72:19,25 128:9 137:18 138:22</p> <p>limitation 36:5 37:8 76:12 260:9</p> <p>limitations 138:11</p> <p>limited 73:5 76:3,3 109:4 109:15,15,18 109:18 110:1,1 111:16 126:21 126:21 155:10 205:5 218:3 237:17 246:15</p> <p>limiting 213:23 217:22</p> <p>limits 140:15 143:3 145:10 146:7 188:25</p> <p>lincoln 3:14</p> <p>line 18:5 49:13 81:15 98:25 116:11 143:25 144:3 162:22 216:1 267:18 279:14 283:15</p> <p>lines 161:7 279:13</p>	<p>linking 227:2</p> <p>list 69:23 109:17 219:21 226:6,18 241:24 242:5 259:9 260:15 263:4 267:6,6 285:6</p> <p>listed 259:18</p> <p>listen 129:3 147:9 159:24 256:22</p> <p>listened 154:23 162:25</p> <p>listening 109:21 250:10 250:12,24,25 253:9</p> <p>litigation 176:3 257:15 266:25</p> <p>little 6:13 20:25 27:5 29:24,25 33:5 35:2 39:6 44:14,21 48:20 53:16 56:24 58:14 65:9 74:20 76:15 79:18 92:25 96:22 99:6,13 102:4 104:1 122:14 123:10 126:12 133:18 138:14 139:7 139:21 141:6 149:23 152:4</p>	<p>152:22 153:2 156:14 164:14 182:12 189:4 191:16 194:7 197:18 198:7 200:18 203:4 206:13 214:1 252:7 277:18</p> <p>live 10:24 170:18 172:17 173:16 246:15 252:4,5,9 257:10</p> <p>lived 8:1 173:5 243:21 245:2</p> <p>livelihood 278:3</p> <p>lives 252:19</p> <p>living 9:8 243:22 244:17</p> <p>llp 2:15,21</p> <p>loans 276:25</p> <p>local 14:1 244:7,9,18,22</p> <p>located 10:17</p> <p>location 72:15 143:8</p> <p>logging 286:14 286:14,25</p> <p>logically 27:12</p> <p>logistically 140:3</p> <p>logistics 142:8</p> <p>london 14:19 166:8</p>	<p>long 34:14 37:20 41:14 93:23 98:11 127:9 139:14 167:24 169:1 170:2 172:18 253:13 266:20 268:23 270:7 279:21 280:3 280:11 281:25 286:17</p> <p>longer 32:11 34:24 35:7 62:13 85:19 92:13 100:3 138:24 139:21 143:10 148:10 153:16 155:24 157:9 202:3 224:16 285:3</p> <p>longest 228:12</p> <p>look 22:18,20 24:9 39:16,17 52:20 55:9 80:10 89:17 90:9,17 91:7 93:11 96:21 97:1,14,19,20 123:10,25 125:25 156:9 156:12 164:17 169:15 173:22 173:23 180:11 194:1 195:6,8 195:13,16</p>
---	---	---	---

[look - madam]

197:24 202:1 202:12 217:19 218:7 221:1 228:11,25 231:2 233:8,10 233:11,12 235:13 259:12 262:22 276:18 278:19 281:16 285:25 looked 40:12 43:7 55:18,25 56:7 144:4 149:24 194:17 229:16 268:13 271:20 272:11 looking 23:18 29:19 39:16 47:4 48:8 49:2 49:25 50:24 55:13,22 70:12 70:14 82:9 86:15 87:1 89:25 90:12,15 91:15,25 93:3 95:7 96:24 97:2,24 98:1 99:23,24 102:14 111:21 123:8 126:13 140:4 152:6 153:12 156:24 161:23 163:19 169:7 173:7 175:11 183:13	196:23 201:20 251:8 268:18 270:9 277:10 280:23 looks 42:11 82:2 84:11 98:5 119:23 152:1,5,11 270:11,11 loop 117:24 loophole 76:8 126:9,15 129:18 loopholes 126:13 lose 245:12 267:17 loses 13:16 loss 182:4 185:4 losses 193:9,10 lost 13:2 27:22 44:18 145:1 164:1 166:5 179:1,11 193:10 234:3 286:11 lot 8:24 18:3,7 20:11 36:9,10 42:22 45:5 59:19 60:13 68:7 96:11 121:20 122:7 123:22 131:22 142:10 145:22	153:23 161:6 164:6 168:4 170:19 171:7,8 171:24 183:16 184:13,14 185:1,13 187:17,23 196:24 204:15 204:24 208:6 209:5 212:14 221:18 222:21 227:25 228:1 229:4 231:22 233:11 234:8 234:23 254:18 266:19 267:23 267:24 268:12 270:20 273:3,8 276:15 277:15 278:1 280:16 280:17 281:3,7 281:21,24 282:10 lots 52:21 70:16 122:8,9 122:9 176:11 louisiana 268:24 love 89:15 131:10 207:4 low 8:9 12:24 101:10 150:1,2 150:2,6 164:12 219:7 220:4 225:17,25	264:13 265:22 lower 13:16 40:1 103:10 190:25 191:1 204:1 219:6 220:7 lowering 59:5 191:11 ltp 56:4 luckily 65:6 252:4 lumping 93:24 119:20 206:1 231:11 lunch 134:23 135:1,5,7 174:4 244:11 m m 5:25 135:24 135:24 239:17 249:25 250:8 250:18 ma'am 151:5 151:23 madam 6:17 14:14 60:25 78:6 84:10 99:5 108:25 120:20 135:11 149:3 155:10 158:1,5 163:11 166:21 167:3 174:23 230:2 238:2 239:23 255:15 284:15
---	---	--	---

[made - marginal]

made 26:1 27:11 28:15 36:7 37:13 49:25 79:14 123:2 133:14 171:16 172:11 187:20 230:16 251:17 282:7 mail 239:10 main 245:6 maintain 33:2 134:19 168:14 213:18 215:17 217:13 284:3 maintained 226:19 232:25 maintaining 178:15 maintains 202:22 267:5 maintenance 47:2 100:19,22 100:24 101:1 185:12 major 208:12 273:6 majority 12:15 make 7:6,13 8:8,16,18 9:6,9 10:24 12:14 19:20 21:11 23:6 24:10 25:21,24 26:6 26:16 27:11 32:24 33:21,23	35:17 38:9 51:10 55:9 57:14 60:17,19 61:1 63:22 65:8,10 69:13 74:24 105:23 117:13 118:19 118:19 122:5 124:1 132:3 141:25 145:23 146:10 166:23 167:19 168:25 168:25 169:16 172:19,19 173:25 178:10 184:4,7 191:11 191:13 208:15 216:1 219:11 249:14,18 251:24 252:19 254:22 255:1 284:9 maker 33:6 makes 28:1 51:4 93:13 174:9 183:1 240:11 making 9:12 13:11 23:22 95:10 106:24 218:4 280:9 man 103:10 manage 199:24 199:24 200:7 207:25 208:9	218:20 220:2 managed 220:5 management 180:13 185:12 191:23 225:14 278:17 279:2 280:19 284:21 284:23 285:1,8 manager 112:2 managing 48:5 199:25 208:18 mandate 165:22 201:7 224:6 283:21 286:9 mandated 33:18 37:4 mandates 223:13 mandating 33:24 mandatory 210:25 manipulate 141:18 manipulated 262:9 263:16 manner 171:3 180:2 217:20 282:15 manufacturing 8:3 march 41:25 margin 207:9	marginal 12:24 16:25 17:2,3 18:13,24 19:2 21:11,22,25 22:8 39:4,5,17 39:19,20 40:9 40:13,21 41:1 41:1,6,12,23 42:4,7 43:6,17 43:18 44:11,13 44:25 45:24 47:12,13,15 48:23 49:4,11 49:19,21 52:7 52:13,13,25 54:19,20 56:1 56:13,21 57:17 57:21 58:1,17 58:21,24,25 59:3,5,13,15,16 59:19,21 60:1 77:2,5,7 80:21 81:2,18 83:9 85:19 86:18 92:13 93:21 95:3,6,8,21,23 95:24 96:5 97:4,9 100:4 100:10,13,18 100:18 101:9 101:15,17 103:25 104:6 104:10,14,21 105:9,15 106:6 106:14,18
---	---	---	---

112:18 116:11 116:15,24 117:8 121:21 122:1,17 123:14,17 124:16,18 125:14,19 130:12 168:12 177:7 178:6 186:7 190:15 190:18,23 191:15,19 192:6,10,14 193:2,2,18,19 193:23 194:20 194:24 195:1,3 195:11,17,22 196:3,19 198:22 199:2,4 199:7,12 204:14,23 213:16,16 214:18,18,21 214:23 215:3,4 215:7,8,10 218:19 219:8 219:11 220:1,4 220:10 222:13 225:6,8,10,20 227:17 229:13 269:11 280:24 281:18 283:3 283:10 marginally 193:5,7,13	mark 22:3 marked 78:16 market 173:15 185:21 227:22 279:20 280:2 280:10 marketable 117:17 marks 109:23 109:24 marshall 39:13 mary 239:18 massive 249:12 272:22 274:3 master 219:21 master's 10:17 matching 201:7 material 18:3 123:20 212:25 218:4 materials 259:9 259:18 math 257:19 264:8 matt 2:7 matter 1:9 15:20 78:7 83:14 94:8 108:4 288:13 288:15 matters 42:19 164:19 matthias 3:12 3:12	maturity 215:25 278:13 280:8 maxed 25:19 128:8 maximum 36:2 143:6 184:3 276:4 maxwell 110:15,21,22 110:24,25 157:19,21 mcf 91:16 98:2 98:12 99:3,3 144:2 152:17 mch 116:5 meals 244:7,11 244:12,13 mean 13:2 21:25 38:17 55:4 58:6 60:9 70:11 85:6,8 87:1 93:7,21 94:23 100:25 119:16 141:14 141:18 147:24 150:2 153:21 154:22 156:4,5 156:5,12 179:10 180:22 186:2,4 188:6 208:2 210:9 233:6 236:15 252:9 253:16 267:19 270:6	278:16 meaning 117:1 132:14 151:3 meaningful 172:12 183:7 193:6 means 32:12 40:2 62:10 87:3 155:22 meant 66:25 208:8 measured 49:20 measures 249:17 mechanical 24:8 38:13,17 42:23 83:16 84:3 119:25 136:20 138:3 141:1 142:18 145:14 149:22 150:10,13,14 189:3,12 223:11 224:18 281:5,10 mechanically 225:3 mechanisms 13:9 222:15 meet 12:8 40:22 41:23 42:17 49:20 61:15 79:9 149:9,10 211:7
---	---	--	---

[meet - minutes]

<p>211:17 212:15 255:22 meeting 79:11 79:12 meetings 79:13 251:1 meiklejohn 239:11,16,17 239:21,23 241:5 member 1:21 1:22 6:24 248:7 members 1:20 167:15 168:6 171:21 memorized 261:3 memory 49:9 271:10 men 254:18 mention 183:12 251:24 mentioned 55:13 122:8 253:1 merc 280:22 mere 189:24 merely 224:15 mergers 217:4 mess 242:9 249:20 message 170:7 messes 7:5 246:23 247:12</p>	<p>met 79:11 111:12 115:15 169:25 236:3 255:19 methane 54:22 194:14 249:2 mexicans 167:21 242:18 246:14,15 247:4,15 248:24 249:11 252:11 mexico 1:2,7 2:4,9,11,16,22 3:5,10,14 7:11 7:12 8:1,4,6,24 9:9 10:7,14,20 10:24 11:5 12:4 13:6,12 13:16 27:2 57:4 102:23 103:1 109:17 110:3 144:5 147:15 148:19 150:23 154:21 165:24 167:10 167:17,24 168:14 170:22 173:9,25 176:7 181:4 193:4,6 194:14 195:1,8 195:12,15 197:3 199:12 203:1 211:7 213:2 215:5</p>	<p>217:11 228:14 229:23 240:2,7 240:12,22,25 241:1,20 242:12 243:21 243:24 244:25 245:9,11 246:11 247:14 248:10,21 249:19 251:9 252:4 253:5,5 253:11 254:16 257:8,10 258:22 260:21 264:12 266:11 268:11 272:16 274:20 282:8 288:4,18 mexico's 7:3,14 12:7,15 165:17 167:13 169:14 170:25 177:5 179:8 188:10 193:9 205:12 240:20 251:3 253:13 258:8 284:11 michael 149:7 microgrids 236:14 mid 12:14 203:21 211:21 231:19 232:1 midstreamer 99:4</p>	<p>miguel 3:5 167:4 miles 276:10 military 10:4 million 8:22 52:25 55:14,23 56:17 155:2 228:17 241:21 248:18 271:25 272:12,13,17 272:19 millions 12:20 mind 40:17 68:16 69:9 88:16 122:18 199:11 201:19 mine 245:17 mineral 21:5 118:5 minerals 2:10 minimal 32:24 minimum 214:8 226:23 minimums 188:4 minor 208:4,15 208:19 224:17 minus 267:21 276:20 minute 30:15 minutes 5:14 77:24 78:1 135:4 174:11 239:7 284:14</p>
---	---	--	---

[mischaracterization - move]

mischaracteri... 281:22	modernize 7:2 247:5	273:9 276:11	187:21 198:16
mischaracteri... 219:25	modification 29:19 61:25	moneys 11:8	227:19 263:3
mischaracteri... 218:19	63:13 72:8	monitoring 180:3 184:14	moore 4:9,14
misclassificat... 182:3	138:16	monitors 162:12	108:22,23,25
misclassify 225:12	modifications 19:6,8 21:14	montgomery 4:12 14:18	109:3,6 110:11
misleading 237:24	21:15 23:20	34:9,21 36:8	110:13 155:9
missed 259:16	26:16 29:8,22	37:15 135:9,13	155:10,13,15
missing 233:23	30:2 31:1,12	135:21,23	157:15,17
missouri 268:22	32:18,20 34:11	136:6,10,12	moot 128:10
mistaken 151:25	34:12 37:1	143:2 146:12	morgan 61:10
misunderstan... 96:7	62:21 63:3	147:3,7 148:25	69:4 113:11
mitigation 242:2	71:12,17,18	149:7 151:18	147:4
mm 42:8,15	78:12	153:6 154:18	morning 5:3
58:5 73:11	modified 17:24	155:14 157:20	10:1 11:18
84:18 87:10	48:2 74:24	158:5,12	12:2 14:14,15
89:19 104:7	236:8	163:10,15,24	15:13 79:2
116:19 132:17	modify 198:17	166:6,14,15	109:5 111:10
mobility 212:16 218:2	modifying 187:2 225:21	montgomery's 14:22 143:2	114:10 134:8
mobilization 187:23	279:1	146:14 152:23	250:4 253:23
modander 2:12	molecule 236:17	month 19:16	287:6
modern 178:13	moment 34:15	168:21 182:21	motions 169:9
233:20	42:4 60:25	190:22 211:24	mouth 112:22
	65:3 68:20	228:2,3 261:21	move 14:12
	78:18 109:1	264:17	18:6,11 19:3,9
	146:17 147:6	monthly 246:16	19:17 20:22
	159:11 238:10	months 19:12	32:10 47:7
	money 10:24	19:13 43:9	76:24 78:10,14
	11:6 232:25	122:4,6,13	83:8 89:9
	240:11,17	129:7 156:20	96:14 99:20
	244:24 255:3	168:21 184:2	103:22 105:19
			141:7 143:1
			146:13 166:19
			178:18 179:14
			181:1,21
			182:14 183:2

[move - needs]

183:19 185:1	multitude 44:2	58:14 114:20	226:1,2 242:7
185:16 186:17	n	narrower 52:8	246:21
187:14 188:8	n 2:1 3:1 4:1	219:17,20	necessitates
188:18 190:7	6:9,10 7:20	narrowly 48:22	31:23
191:17 192:9	11:22 135:24	181:6 219:19	need 8:16,17
193:1 195:20	239:18 241:10	nasty 88:24	9:5,6 11:7 12:8
196:4 197:5	246:3 254:6,7	nation 173:7	18:20 22:1
198:9 200:14	254:7	national 167:17	24:22 33:15
203:6 207:11	name 5:4,11	193:7	34:23 44:12,20
207:21 209:13	6:7,9,23 7:16	nationally	48:4 54:2
209:22 210:2	7:19,25 9:20	264:13 268:10	58:13,24 63:24
211:14 212:1	10:2 11:20,21	native 167:20	64:1,19 75:15
213:7 214:6,16	11:22 12:3	natural 2:10	91:25 94:17
218:11 222:23	15:3,14,15	12:7 167:6	128:20 129:7
238:4 245:3	46:13 97:7	179:9 243:23	129:12 185:14
moved 78:8	109:5 111:10	247:10	207:3 209:10
123:17 127:23	135:22,24	nature 45:1	217:18 219:9
193:11 213:4	136:11 147:3	near 223:4,14	223:12 236:15
245:4,6	149:7 155:14	235:6 241:25	236:17 238:16
moves 214:12	167:4 174:14	271:24 272:23	250:15 252:5
moving 31:23	175:18,20	276:11,15	255:1 262:20
38:23 102:2	239:3,15,16,17	nearly 242:18	270:1 271:3
142:13 189:20	241:8,9,10,16	245:6	284:2
190:17 197:24	243:10,18	necessarily	needed 44:1
198:21 199:14	245:23 246:2,4	99:10 160:17	47:25 121:15
200:24 206:8	246:10 247:20	193:14 207:3	224:8 226:10
215:16 222:2	248:4 250:15	208:8 229:14	267:23 269:20
234:14	250:18 254:4,5	265:24 271:22	274:4
msuazo 3:6	254:6	273:7 281:8	needing 117:13
multi 235:10	named 93:24	284:6	242:2
265:19	names 5:19	necessary	needle 106:25
multiple	nanasi 110:14	18:15 19:17	107:2 125:1
221:21 229:2	157:18	82:18 91:12	needs 131:17
230:19 244:2	narrow 49:11	92:18 93:5	137:24 146:9
264:19 269:23	52:14,16 53:6	101:19 214:23	191:23 242:21

[needs - non]

<p>252:16 260:5,5 negative 204:7 205:7 246:25 negotiate 61:16 negotiating 150:20 negotiations 28:4 171:12 neighboring 13:12 neighbors 246:13 neither 12:11 107:18 278:21 282:19 288:12 nerdy 258:13 net 273:23 neurological 249:10 never 97:3 147:13 179:13 180:7,21 nevertheless 59:19 150:24 285:12 new 1:2,7 2:4,9 2:11,16,22 3:5 3:10,14 6:20 7:3,11,12,14 8:1,4,6,24 9:9 10:7,14,20,22 10:24 11:5 12:4,7,15 13:6 13:12,16 16:24 16:25 20:22</p>	<p>21:6 22:24 23:4,11,18 27:2 30:23 31:11 39:24 64:9 71:21 73:16,20 74:1 74:13,21 75:1 88:6,20 89:5 96:9 102:23 103:1 109:17 110:3 112:18 141:5 144:5 145:3,7,24 147:15 148:19 150:23 154:21 162:3 165:17 165:24 167:10 167:13,17,21 167:24 168:14 169:14 170:22 170:25 173:9 173:25 176:7 176:25 177:5,7 177:14 179:8 179:15 181:4 182:6,15 187:6 188:10 190:3 190:14 193:4,6 193:9 194:14 195:1,8,12,15 196:19,21 197:3 198:18 198:19,24 199:1,3,12 201:8 203:1</p>	<p>205:8,12 206:5 211:7,11,17 213:2,16 214:2 214:21,23 215:5,6 217:11 217:24 219:8 224:9 226:12 228:14 229:23 240:2,7,12,20 240:22,25 241:1,20 242:12,18 243:21,24 244:25 245:9 245:11 246:11 246:14,15 247:4,14,15 248:10,21,24 249:11,19 251:3,9 252:4 252:11 253:5,5 253:11,13 254:16 257:8 257:10 258:8 258:22 260:21 264:12 266:11 268:11 272:16 274:20 282:8 284:11 286:22 288:4,18 newer 231:11 231:12 nice 43:19 149:9,10 253:5</p>	<p>night 287:5 nine 242:18 nitroglycerin 235:5 nm 2:10,14 3:3 nmac 1:10 62:13,14,14,15 63:9 65:20 69:18,22,25 71:1 186:19 260:2,25 nmoga 4:21 50:13 111:5 124:21 158:1 166:20,22 168:6 171:16 171:19 173:18 175:21 198:6 205:15 210:22 238:4,13 255:25 282:4 282:19,24 nmoga's 167:15 175:22 210:23 nmsa 66:8 non 17:3 27:21 27:22,24 41:1 43:18 51:14,20 56:21 58:11,21 64:5 106:8,19 173:10 208:22 209:4,6 210:7 210:7 211:2,25 212:2,6,25</p>
---	---	--	---

[non - ocd]

<p>214:8 224:4,25 244:8 265:22 281:10 286:8 noncompliance 50:17,22 nonproductive 12:21 185:10 norm 237:22 normal 79:19 277:10 normally 117:17 norms 217:6 north 194:1,7,9 202:20 northwestern 242:11 note 193:12 199:17 234:17 noted 183:24 195:2 203:18 212:13 221:14 225:15 231:15 237:9 276:10 notes 226:6 notice 189:7,16 229:2 239:10 noticed 154:16 notices 27:20 noting 235:1 nuclear 253:15 number 10:7 31:10 41:10,18 48:6 49:6 54:8 54:9 76:1,15</p>	<p>83:11 84:17 89:11 96:15 97:13 121:6,10 121:19 122:3 122:16 123:8,9 123:11 125:9 126:7,7,20,21 126:21,22,25 126:25 127:13 127:13,14,25 128:11,12 129:1,16 130:17 131:20 137:19,20 151:15 159:13 161:10 177:24 199:23 206:3 206:23 216:2 233:17 263:4 266:21 276:19 278:18 numbers 52:22 103:11 120:17 195:9 216:1 261:3 271:8 272:6 275:17 numerous 79:24 161:13 nw 3:4 288:18 nykiel 2:7,7</p>	<p>246:4 250:18 250:18 254:6,7 o'clock 250:6 o'grady 4:8,13 61:5,7,9,10 66:25 67:1,3 77:11,14 146:23,24 147:2,4 148:23 object 104:24 105:4 152:21 objecting 74:6 objection 66:24 objectionable 105:7,10 objections 78:18 104:23 146:17 238:10 objects 104:20 obligation 22:14 187:10 266:2 267:10 obligations 12:9 182:4 186:20 190:16 204:12 216:12 217:13 219:16 224:5,7 observed 107:14,17 obtain 188:23 obtained 219:23 obtaining 64:7</p>	<p>obvious 18:2 obviously 45:9 153:23 164:19 occ 5:6 79:3 164:4 196:9 225:16 238:21 282:5 occur 203:8 257:23 occurred 113:3 115:14 147:22 148:3 179:13 occurs 174:4 ocd 26:5,19 28:24 29:21 33:5 61:15 72:5,22 73:1 75:2,10,12 76:4 79:8 85:12 90:6,12 91:7,9,12,25 92:20 93:3,5 93:10 94:7,13 95:22 97:14 102:16 103:8 105:19 106:5 107:13,24 108:4 114:19 121:15 124:14 126:22 128:15 128:17 131:22 132:18 137:12 156:1,6 159:25 160:8 161:2,8 162:12 173:12</p>
	<p>o</p>		
	<p>o 6:9,10,10 11:22 135:24 135:24 216:21 239:17,18</p>		

[ocd - oil]

178:21 180:12 181:7 185:14 188:23 196:9 199:24 200:7 201:21 208:25 211:13 221:4,9 224:14,23 226:10,13 229:7,15 230:13 260:24 261:15 262:2 265:17 266:21 267:5 269:14 270:16,19 271:2 273:11 273:14 274:21 274:23 275:13 275:22 276:12 278:16 279:11 280:13,16 282:6 284:3 ocd's 33:14 103:20 121:13 152:13 170:3 171:10 198:17 209:25 219:21 220:20 221:13 223:22 226:25 276:7 277:9 286:9 october 1:14 288:4 odd 37:12 offenders 27:2 28:24	offenses 26:14 offer 11:12 14:8,11 171:25 172:6 249:23 250:2,13 253:22 255:8 267:15 278:11 offered 196:12 282:19 offering 257:2 258:6 offers 57:22 offhand 150:23 office 14:21 109:7,11 155:16 164:5 242:19 officer 1:18 5:3 5:4 6:3,5,12,18 6:22 7:15,21 7:24 9:15,19 9:22,25 11:10 11:19,23 12:1 14:6,15 15:2 27:5 60:25 61:3 77:13,19 77:25 78:3,7 78:17,22 84:10 99:5,17,21 108:20 110:13 110:23 111:2,7 114:4 116:3 120:21,22 134:4,16 135:2 135:8,12,14,17	135:21,25 136:3 146:16 146:22 149:1,3 152:24 153:5 155:8 157:17 157:23 158:2,3 158:5,6 159:7 163:9,12 166:11,13,19 166:22 167:3 174:2,10,13,18 174:21,24 211:1 230:2,6 238:2,9,16,20 239:19,22,24 241:4,11,14 243:5,16 245:25 246:5,8 247:16,19,23 248:1 250:14 250:19,22 253:19 254:3 255:5,16 284:13,16 287:4 official 27:7 offs 106:13 offset 274:1 oftentimes 286:11 ogrid 54:6,8,12 ogrids 98:7 151:9 oh 20:12 55:20 62:7 66:20	70:22 79:9 83:6,20 88:4,4 103:10 110:23 122:18 129:10 132:5 142:3 148:1 174:16 282:15 oil 1:3 2:9 3:3 5:5 7:6 8:10,12 8:21,23 9:2 11:5,8 12:15 13:7 19:12 27:17 39:24 47:17 54:7 66:15 79:20 82:14 83:3 84:8 86:14 87:2,2 89:18 91:16 92:8 98:3 99:25 102:25 107:14 108:5 111:15 128:14 139:4 140:22 141:7 141:25 142:2 143:23 144:12 144:13 146:2 149:8,13 150:3 150:7 151:10 158:24 161:23 164:17,21 167:10,13 172:24 173:21 178:13,24 180:1,17
--	--	---	--

[oil - operation]

184:11 186:6 190:19,19,20 193:9 194:8 200:6 207:25 208:7,17 211:23 218:23 220:13 228:17 232:23,24 233:25 235:15 235:17,17,19 235:22 236:21 237:10,13 240:4,9,11,18 241:15 242:9 242:11,11,19 242:24 243:2 244:9,16,18,22 244:24 245:8 245:18 246:19 247:7 248:9 249:13 251:2 251:13,25 252:6,14,20 254:15,20,21 258:8,10 260:14 267:20 267:22 268:25 269:1,23 272:18 275:5 276:15,20 277:16,20 279:5 286:3 288:4 ok 143:19	okay 6:21 7:18 14:10 17:11 20:13 21:13 23:23 25:1,12 31:16 41:10 42:6,22 48:8 50:11 63:19 64:13 65:12 66:7 68:7,15 68:20 69:1 70:16,23 71:5 72:18 73:9,23 73:24 75:1 77:21 78:19 80:23 81:4,16 82:13 83:7 84:9,22 85:1 85:15 86:13,20 86:25 87:18,24 88:15 89:15,25 90:5,8,10,25 91:14 92:6,10 92:15 93:16 96:18 97:10 98:23 102:2 103:14 104:13 104:19 106:20 112:20 114:23 115:14 123:1 125:25 128:5 128:11 132:8 133:14 147:11 148:3,23 151:8 151:13,20,24 153:8 154:20	154:25 160:20 174:10 175:12 189:11,20 190:7 191:17 201:14 208:11 210:9 212:1,9 216:8,18 219:24 220:19 222:2 223:17 224:11 225:5 228:5 246:9 256:12,21 257:1 258:3 260:2 262:6,18 262:19,22,23 263:14 264:5 264:10 265:9 271:23 272:16 274:24 275:22 276:13 277:12 278:4 287:2 oklahoma 10:5 13:15 228:16 268:22 old 40:25 89:1 175:9 231:11 231:24 252:2 266:19 281:24 older 88:18,25 111:21 236:12 omits 223:24 once 41:21 72:4 90:21 96:18 132:15 150:3 179:1 187:20	189:7,16 286:10,19 ones 40:24 88:23 194:16 201:24 ongoing 108:7 203:14 212:21 online 144:14 238:25 onsite 236:9 open 6:10 8:19 9:13,13 47:18 47:19 130:6 282:5 opened 129:22 opening 4:4 166:23 167:1 opens 7:7 operate 168:14 171:2 173:6 211:8 215:4 operated 57:9 97:16 operates 56:14 274:24 operating 9:10 12:25 26:13 48:5 53:17,22 54:5,11,15 93:10 102:22 103:9,15,20 167:15 210:5 operation 82:9 99:10,19
--	---	---	--

[operational - oral]

operational 79:25 80:8 88:1 99:8 172:20 183:14 185:10 191:22 203:10 206:20 211:5 214:25 223:5 225:13	107:14 109:14 112:25 113:6 122:5 123:12 123:22 132:12 137:19,20,24 140:8 142:24 146:8 155:1 165:2 177:14	32:11 48:4,14 51:15 52:13 53:9,11 57:2 57:10,15,16,17 60:12 79:20 85:13 92:17 95:2,22 96:6 114:19 123:16	opinion 52:12 57:13 76:10 82:15 83:2 106:1 118:24 119:1 145:20 178:2 179:7 182:3 194:22 196:25 198:4
operationally 178:3	177:15 183:12 187:5 189:8,18	123:25 126:13 126:18 129:18	205:9 214:22 258:7 259:10 259:19
operations 22:19 29:3 40:13 81:14,19 90:17 132:19 231:17 245:6 258:10 277:10	199:7,18,20,23 202:5 204:1,22 209:23,25 210:5,10,12,19 210:20,22 211:11,14,17 211:20 212:19 222:9 228:23	141:3 143:6 147:15 148:19 160:5 161:3,17 164:3 167:11 168:13 170:6 170:21,21 173:6 183:7 184:25 185:2	opportunities 269:3 270:10
operative 215:24	228:23 232:21 232:25 233:16 233:18 242:20 265:11,20 266:2 267:9 269:13,18,24 270:15,19 273:19 275:8 275:11 276:12 277:5,17,20 278:12 280:7 285:19	166:13 170:6 170:21,21 173:6 183:7 184:25 185:2 185:14 186:7 188:22 192:19 195:8 201:2 203:21,24,24 204:24 207:4,7 208:4,14 209:3 211:3,21 215:9 216:6 217:13 221:11 226:24 227:3,8 228:1 229:12 240:9 263:2 266:20 266:23 267:7 276:5 278:1,2 281:25 283:9 285:25	opportunity 10:2 14:9 60:20 123:16 161:2 166:18 243:3 268:15
operator 24:5 26:10,22 27:9 27:19 28:12,19 29:12,20 44:19 45:16,19 49:20 50:14 53:3,4 54:9 55:10 56:1,13,25 58:24 59:16 60:1,5,13 64:25 65:18,22 65:24 66:2 71:1,24 72:12 73:14 74:17 79:19 80:24,25 81:3,10,19,23 81:24 102:24	operator's 17:1 49:18 108:5 operators 12:8 12:16 20:19 21:5 26:13		oppose 16:20 21:11 29:4 opposed 139:23 202:12 216:2 265:24 269:25
			opposition 204:18 ops 39:15 optimization 42:24 223:15 option 201:6 216:14 270:12 options 73:15 182:13 232:4 271:16 oral 239:6

[order - oxy]

order 51:17,20 94:15,16 98:24 132:20 138:4 140:7 orders 50:17 51:2,13,13,14 51:16 orient 138:13 143:20 original 118:7 originally 172:7 origination 171:10 orphan 169:21 217:15,18 218:20 219:17 219:20,21 220:1 266:14 266:16 267:6 267:13 268:7 268:14,14,19 268:20,25 271:13,16,18 274:20 279:2 281:17 orphaned 145:17 241:22 271:5 272:18 274:6 275:1,9 276:16,18 277:3 orth 1:18 5:3,4 6:3,5,12,18,22 7:15,21,24	9:15,19,22,25 11:10,19,23 12:1 14:6 15:2 61:3 77:13,19 77:25 78:3,17 78:22 99:17,21 108:20 110:13 110:23 111:2,7 114:4 116:3 120:22 134:4 134:16 135:2,8 135:14,17,21 135:25 136:3 146:16,22 149:1 152:24 153:5 155:8 157:17,23 158:3,6 159:7 163:9 166:11 166:13,19 174:2,10,13,18 174:21 230:6 238:9,16,20 239:19,22 241:4,11,14 243:5,16 245:25 246:5,8 247:16,19,23 248:1 250:14 250:19,22 253:19 254:3 255:5 284:13 287:4 ostensibly 169:23	outcome 224:10 outcomes 13:18 outdated 248:15 outlined 225:19 outlining 33:10 outright 216:13 outset 177:17 outside 17:6 99:7,15 152:22 outweigh 205:8 252:15 overall 16:17 119:2,7 195:6 201:14 280:18 285:16 overarching 153:3 178:19 201:15 213:8 218:14 226:9 overbroad 17:15 225:1 overhead 203:16 204:1 265:20 overlooked 237:8 overly 178:3 217:25 overnight 184:15 overreaching 56:20 57:1	overregulation 245:1 247:2 overruns 221:13 oversees 27:13 overshoot 49:2 overstepping 22:2,5 overview 17:22 19:7 29:14 31:11 34:8,11 40:3 44:7 45:5 45:7 137:7 175:22 owe 164:8 owl 188:2 own 50:10 57:11 211:22 241:17 owned 8:2 owner 118:6 210:6 owners 21:5 211:1 ownership 217:25 218:3 owns 228:19 oxy 2:20 4:20 4:20 14:20 15:17,18 16:20 17:23 19:1 21:15 25:9 26:22 27:11 29:8 32:22 33:12,16 34:8
---	---	--	--

[oxy - participating]

35:2,4 39:19 40:12,25 47:3 51:25 52:19,20 53:3,5,14,17,17 54:11 56:4,5 56:25 57:1,2,4 57:7,15,22 59:14,24 60:5 60:13 61:17,24 63:1,5 64:9 68:9 71:11,21 72:8,18 73:25 76:23 78:21 79:7 80:2,10 80:16,18,19,23 81:2,5,7,11,21 82:3 83:10,22 84:19,23 85:3 85:17 86:20,22 87:3,13,24 88:3 90:2,5 91:13 92:1 94:24 95:5,7 95:13 97:16 98:2 99:8 100:17 101:7 101:14,16,23 102:11,13 103:15 104:20 105:21 106:4,9 106:21 111:17 112:6,10,25 116:9,14 119:23 120:9 120:13 121:23	124:13,20 125:3,10 126:18 127:4,5 128:15 133:5 136:11,22 137:1 138:11 139:23 140:1 140:11,13 143:12 146:19 148:8,22 149:12,12,22 150:16 151:8 152:14 153:1 153:17,18 158:14,17 161:5,19 162:22 163:3 164:3,23 165:1 165:18 166:1 179:11 228:24 229:20 270:6 oxy's 16:7,17 19:5,8 20:6 21:19 23:20 25:15 26:9 28:17 29:14,22 31:1,12 32:17 34:11 38:11 39:11 40:6 44:9,10 45:5,8 48:20,24 52:22 54:5 55:13 59:13 62:20,23 63:13 68:1 71:16,18 72:9	72:22 74:11,14 78:8,10,11 79:23 83:15 95:4,24 98:7 102:4 120:16 130:7 138:16 141:4 143:3 148:9,12 153:3 158:20 161:7 161:15 p p 2:1,1 3:1,1 9:21 243:12,12 246:3 p&a 187:11 198:6 208:6 223:19 p&a'd 186:19 p.m. 11:13 14:9 135:7 174:12 238:19 287:8 p.o. 2:16,21 3:10 pace 236:14 packet 16:7 pad 223:15 page 4:2 97:14 147:17 262:24 279:7,13,15,17 279:24 283:7 283:17 284:18 palace 2:4 pandemic 276:20	papers 235:14 paperwork 279:10 280:13 parameters 125:21 130:13 parcel 171:5 park 9:17,18 9:21,24 10:1,3 parke 9:21 11:10 parse 262:17 part 17:3 18:21 19:1 20:8,16 28:19 32:9 36:22 38:11 39:18,22 44:22 44:24 52:2 58:21,25 82:2 90:23 107:2 108:7,10 115:1 115:1 120:11 122:6 128:6 150:6 159:1 171:5,16 188:24 210:3 231:18 246:14 260:2 261:15 280:15 partial 274:14 partially 265:23 participate 217:15 participating 258:1
---	--	---	--

[participation - permission]

participation 203:21 particular 33:9 94:9 97:20 98:10 105:9 131:12 141:12 142:4,24,24,25 148:1 150:8 151:1 153:13 154:24 190:21 233:16 particularly 12:24 45:21 92:16 186:7 particulars 115:6 parties 45:8 168:24 170:1 218:4 242:24 288:13 partner 14:21 27:6 173:19 partners 14:2 partnership 109:16 partnerships 109:18 110:1 parts 79:16 224:9 party 131:1 242:16,20 278:21 pass 108:17 140:25,25 146:20 155:7	170:24 223:15 passed 81:9 passion 10:14 past 46:4 134:9 141:23 211:1 patch 84:24 85:4 88:2 113:23 patchwork 212:23 patrick 7:16,17 pattern 80:25 97:19,22 pauline 245:21 245:23 246:3 246:10 pause 78:18 146:16 238:9 pay 11:6 56:14 59:20,24 240:12 246:16 paying 248:16 pc 3:4,9 pd 183:13 peak 235:15,17 peaked 235:17 237:10 pecos 1:5 243:24 peltz 52:6 penalizes 209:3 penn 276:24 pennsylvania 228:13	pennsylvania's 235:1 people 51:7 90:17 112:6 118:7 129:25 231:3 234:24 236:15,16 246:14 252:15 252:23 255:2 256:10 percent 17:1 28:18 48:14,15 49:8,9,19 53:9 53:9,11 56:12 56:22 58:18 59:4,7,8 104:14,22 105:2,19,21,25 106:1,6,7,12,12 111:18 125:11 125:13 127:1 133:24 144:18 147:25 148:2 160:5 164:15 195:14 199:4 201:22 210:6 210:13 211:2 211:23 215:10 229:3 240:21 267:3 percentage 54:19 195:10 207:9 percentages 48:24 125:22	perceptions 32:22 perforating 286:14 perform 80:3 87:13 88:2 102:13 138:4 performed 82:6 101:8 102:19 period 17:5 35:19 75:4 79:15 97:4 98:12 152:18 182:21,24 184:4 189:1 190:22 209:21 261:21 263:11 264:17 periodic 76:4 126:22 periodically 73:1 periods 98:1 148:11 223:3 263:3 permanently 72:13 143:7 177:4 186:25 187:16 permian 136:16 165:17 202:6 242:10 266:12 permission 5:23 84:12
--	---	--	---

[permission - plugging]

<p>135:20</p> <p>permissions</p> <p>135:18,18</p> <p>permit 204:13</p> <p>266:1</p> <p>permits 266:9</p> <p>266:10,15</p> <p>permitted</p> <p>268:24</p> <p>permitting</p> <p>86:3 97:15</p> <p>152:13 156:2,4</p> <p>184:12 187:23</p> <p>person 14:17</p> <p>27:15 173:3</p> <p>210:5,12 241:6</p> <p>perspective</p> <p>14:5 22:19</p> <p>129:15 168:23</p> <p>171:19 200:2</p> <p>207:23 280:18</p> <p>pertaining</p> <p>189:3</p> <p>pertains 258:10</p> <p>peter 69:3</p> <p>petition 18:17</p> <p>34:13,17 79:8</p> <p>85:20 101:16</p> <p>106:22</p> <p>petition's 16:20</p> <p>petitioners</p> <p>79:7 240:24</p> <p>petroleum 2:14</p> <p>15:23 149:23</p> <p>176:8,9 180:5</p>	<p>180:6</p> <p>phase 123:19</p> <p>phased 222:7,8</p> <p>phone 253:24</p> <p>phrase 63:7</p> <p>224:16</p> <p>piece 101:2</p> <p>piled 8:12</p> <p>pilot 162:2</p> <p>pipe 273:18</p> <p>pipeline 150:19</p> <p>150:20 185:22</p> <p>place 36:20</p> <p>64:12 71:24</p> <p>137:12 144:23</p> <p>158:17 168:25</p> <p>174:3 187:3</p> <p>215:14 235:15</p> <p>254:23 255:2</p> <p>275:11</p> <p>placed 75:8</p> <p>placement 75:9</p> <p>75:11</p> <p>places 45:9</p> <p>205:16 233:17</p> <p>plain 114:21</p> <p>plan 72:13 84:7</p> <p>126:15 221:3</p> <p>planet 251:19</p> <p>plans 165:8</p> <p>184:8,14</p> <p>plant 8:3</p> <p>150:21 185:23</p> <p>185:24 251:18</p>	<p>platform 7:17</p> <p>11:11 14:7</p> <p>108:24 134:5</p> <p>135:15,16</p> <p>249:22 250:2</p> <p>253:21 255:7</p> <p>play 39:21</p> <p>223:10</p> <p>pleading 11:4</p> <p>please 6:7 9:20</p> <p>11:20 15:4,13</p> <p>112:21 135:19</p> <p>136:10,17</p> <p>137:6 160:21</p> <p>160:22 174:15</p> <p>175:14,18</p> <p>177:20 179:19</p> <p>186:23 189:4</p> <p>189:12 190:1</p> <p>194:24 199:15</p> <p>204:5 205:3</p> <p>210:16 216:10</p> <p>217:9,23</p> <p>218:13 225:7</p> <p>232:7 237:4</p> <p>239:8 243:10</p> <p>247:5,11</p> <p>249:16 254:4</p> <p>plots 41:10</p> <p>plug 44:18,19</p> <p>57:11,16 72:13</p> <p>113:6 118:3</p> <p>124:2 141:4</p> <p>143:7 151:21</p> <p>153:18 154:10</p>	<p>162:3 202:4,5</p> <p>202:8 221:8</p> <p>223:12 227:9</p> <p>248:16 266:2</p> <p>271:3 274:16</p> <p>275:13 276:7</p> <p>276:12 286:20</p> <p>plugged 23:7</p> <p>37:16 57:4,5,7</p> <p>75:13 144:25</p> <p>151:22 152:2</p> <p>153:15,22,23</p> <p>177:4 179:1,12</p> <p>186:25 187:17</p> <p>187:21 206:23</p> <p>207:3 228:14</p> <p>230:20 231:3,9</p> <p>232:1 260:5</p> <p>267:3 273:3</p> <p>274:20,22</p> <p>276:8 281:24</p> <p>286:10</p> <p>pluggers</p> <p>231:20</p> <p>plugging 5:6</p> <p>8:23 12:9</p> <p>31:19 57:9</p> <p>66:10 67:7,14</p> <p>70:24 77:2</p> <p>102:4,16</p> <p>117:14,22</p> <p>120:10 123:13</p> <p>124:5 145:22</p> <p>152:17,18</p> <p>178:25 179:5</p>
---	--	--	---

[plugging - practices]

179:10 182:4 185:6 186:20 187:19 190:13 195:3 197:12 201:24 202:2 203:23 205:22 206:21 211:18 215:25 216:5 219:15,23 221:25,25 222:23 223:4 223:11,16 224:4,7 225:2 227:4,14 229:15 231:4 231:14,17,18 231:23 232:1,5 232:10 238:21 242:22 248:13 260:3 265:13 266:18 267:10 271:2,24 272:23 273:1 273:10,18,20 274:14,15,18 275:8,23,24,25 276:2,9 277:8 278:14 280:9 280:23 283:5 283:19 284:1 284:20 285:3 plugs 201:22 274:7 plus 34:17,24 35:8 46:4	147:25 148:4 178:2 196:11 196:14 point 24:4 30:22 39:23 48:19 67:24 70:6 75:2 106:14 117:16 117:17 118:17 121:13 126:11 126:13 128:10 132:4 140:9 165:11 166:4 166:20 171:25 235:17 pointed 118:14 152:25 points 28:25 126:4 133:3 poised 271:13 policy 12:4 57:14 99:9 221:22 249:16 274:25 poll 242:17 polluting 252:11 pollution 246:25 249:7,9 253:11 254:25 poor 20:19 40:17 171:3 portend 114:20 portfolio 17:2 40:14 44:10	49:18 58:18 83:15 105:20 106:14 193:9 portfolios 104:15,23 105:25 124:1 199:5 283:10 portion 21:18 25:10,13 137:18,22 140:14 195:17 206:11 265:5 portions 138:21 141:20 193:8 pose 240:19 poses 207:5 position 16:17 26:9 28:17 39:11 44:10 153:3 175:22 220:20 possible 54:14 99:3 121:4 185:4 213:19 253:17,18 post 26:2,3 41:24,25 63:15 197:2 207:7 posting 240:4,8 248:11 potential 21:3 22:21,22 91:6 106:8 107:1 116:22,22	118:12,15,25 119:6,6 126:1 170:20 184:18 184:20 185:17 185:19 203:7 206:4,5 212:10 219:10 225:4 229:19 236:12 237:3 274:3 286:1 potentially 41:6 55:13,25 81:15 85:10 106:23 117:22 130:13 179:6 280:23 283:10 powell 20:1 22:7 48:1 50:13,20 58:13 129:10 130:19 168:20 262:2 powell's 28:9 47:10 49:16 57:23 129:3 262:7 263:14 power 181:9 practical 12:12 172:12 211:9 212:9 223:24 practice 13:18 79:20 82:16,18 83:3 218:1 257:14 practices 180:13
--	--	---	---

[pre - prior]

<p>pre 43:19 256:16</p> <p>precise 209:21</p> <p>predicate 80:18</p> <p>predict 89:4</p> <p>predictions 237:10</p> <p>prefer 33:12,12 262:19</p> <p>preferably 214:8</p> <p>preference 58:7</p> <p>preliminarily 61:24</p> <p>preliminary 183:4 186:11</p> <p>premature 117:13,22 178:25 179:5 179:10 185:6 190:13 195:3 203:23 221:24 221:25 225:2 227:14 283:5 283:11,19 284:1,20</p> <p>prematurely 23:7 141:4 162:4</p> <p>premised 143:9</p> <p>premium 171:3</p> <p>preparation 38:24</p> <p>prepare 256:8</p>	<p>prepared 158:14 162:8,9 259:6</p> <p>prescribed 82:23</p> <p>present 24:6,7 41:4 143:22 220:11 268:5</p> <p>presentation 14:22</p> <p>presentations 122:9</p> <p>presented 19:16,25 31:22 122:12,12 148:9,14,16 169:21,22 236:22</p> <p>presenting 14:23 37:11 41:5 169:15 173:22</p> <p>presently 207:21</p> <p>preservation 216:9</p> <p>preserve 213:19 215:21 226:25</p> <p>preserving 33:4 178:14</p> <p>president 12:3 136:14 231:16 257:3</p>	<p>press 5:24 11:15 236:16 249:25 253:24</p> <p>pressure 47:2 96:12 98:24</p> <p>presume 159:20</p> <p>presumes 182:19</p> <p>presumption 45:20 91:11,20 94:24 95:13,20 97:5 179:21 182:15 183:1,5 183:8,21 184:1 184:6 186:11 213:13 214:11 261:16,19,20 262:4 265:2,12 265:17 269:10 277:22,24 283:4,19 285:10</p> <p>presumptions 177:2 179:17 190:10 226:12</p> <p>pretend 133:5</p> <p>pretty 83:6 86:7 117:17 127:20 129:2 130:14 138:18 150:2 213:5 253:2 258:15</p> <p>prevalence 199:12 215:5</p>	<p>prevalent 197:3</p> <p>prevent 22:12 22:15 27:1 28:23 46:23 116:16 119:3,4 119:8 248:16 270:17 283:21 286:9</p> <p>prevention 20:19 177:12 207:15,20 209:15 226:5</p> <p>prevents 116:21 141:3</p> <p>previous 89:21 123:2</p> <p>previously 27:5 41:1</p> <p>price 25:15 84:8,8 200:22 267:20</p> <p>pricing 39:24</p> <p>primarily 111:13 167:7 237:17</p> <p>primary 21:2,7 141:12 161:14 233:13 274:23</p> <p>principles 76:2 76:11</p> <p>prior 18:19 22:17 31:3 41:12 46:10,12 68:4,17,23</p>
--	---	---	--

[prior - production]

73:13 82:6 88:8 99:15 192:14 pristine 7:12 private 10:13 232:11 267:3 probably 6:20 22:8 52:9 69:5 80:7 83:13,20 90:14 92:23 96:2 105:22 110:5 114:11 118:5,6 121:21 121:21 122:18 122:19 129:6,7 130:1 133:1 134:25 145:2 208:17 211:20 probe 261:9 problem 19:15 19:25 31:24 32:24 33:8 69:7 90:3,14 90:20 91:6,24 122:13 210:8 268:8,13,14,16 268:19,20 269:4 271:13 275:25 276:9 277:21 problematic 200:3 201:17 problems 36:7 42:23 88:21,22 89:6 91:8	126:6 249:8,9 273:13 procedural 226:15 procedurally 183:6 procedure 182:25 procedures 113:7 proceed 15:1 199:19 230:4 proceeding 109:7,22 155:17 158:15 167:22,25 168:2,3,5,18 169:6,11,19 170:9 171:13 171:17 172:7 173:14 175:17 177:18 190:24 230:6,13 proceedings 1:13 4:3 5:2 111:11 139:22 167:7 171:15 287:8 288:8,10 proceeds 182:8 process 19:24 28:20 36:7 64:2,6,12 68:16 115:4,12 122:7 138:7 146:11 170:2	171:9 173:20 183:3 188:25 235:11 251:22 261:13 279:6 processes 74:18 279:10 280:13 processing 99:4 procurement 221:13 produce 83:19 98:24 99:2 129:22 149:13 150:16 151:9 165:23 produced 83:11 87:15 92:8 98:13 100:1 145:3 164:11 180:13 228:17 234:1 244:24 260:14 261:22,22 producer 251:18 producers 12:14 produces 190:19 228:16 228:18 264:16 277:19,23 producible 87:18 producing 12:24 40:1 42:14,15 43:6	47:17 130:9 150:2 165:20 165:21 193:3,5 193:8,13,15 207:25 216:7 219:7 220:8 222:12 225:17 225:17,25 228:12 232:23 254:17 264:13 265:7,9,22 276:14,22 277:5,14,16 285:4,9,9,15,18 286:3 production 12:23 13:22 40:13 41:14 42:25 43:2,4 43:19 44:5,17 47:16,20 49:9 59:8,12 77:9 86:1,4,5,10,14 86:16,23,25 87:3,20,20 89:16,21,25 90:12,16 91:16 91:17 92:7 96:6,25 97:2 97:19,20 98:4 98:8,11 99:24 101:10 102:15 105:6 111:20 111:22 113:22 116:10,14
--	---	--	---

[production - propose]

118:20 136:23 139:11 143:24 144:2,10,13 145:8 147:18 148:10 150:6 150:25,25 151:4 152:2,8 152:9,17 153:14,23 154:10 159:2 160:5,15 161:13 164:12 164:15,18,21 167:18 180:3 182:5,19,22 183:16 185:18 185:20,21 186:5 193:7 195:16 198:16 211:24 214:8 220:12 225:11 226:22,25 232:12,13,19 233:1,13 234:12 237:10 251:25 262:3,8 262:9 263:8,16 263:22 264:6 276:17 281:9 285:16,19 286:8 productions 232:22 productive 101:10 180:2	181:6 225:11 professional 82:15 83:2 107:12 136:18 136:21 176:6,8 257:7 professionals 212:17 237:15 professor 8:5 proffer 95:10 107:8 profile 54:17 profit 244:8 246:20 249:19 profits 242:24 program 10:9 10:17 37:13,20 37:21 39:18,22 41:5 44:22 133:6,10,16 176:11 177:6 188:11 196:3 205:18 230:24 244:8,8,12 272:18 280:23 281:2 programs 13:14 35:6 46:5 136:14 232:10 244:21 progress 79:15 132:22 prohibit 212:5 prohibiting 212:2	project 33:21 35:13 37:11 92:3 141:25 146:2 150:7,10 164:20 179:12 185:24 270:5 285:21,21 projected 184:13 projections 191:24 projects 34:20 34:23 46:19,23 139:4,5,5 140:21,22 141:5,9,22 142:2,12 148:12 162:2 220:17 232:14 246:24 prolific 257:18 promising 10:22,25 promote 185:6 190:12 promotes 227:11 promulgated 209:3 propane 252:7 proper 100:18 145:16 properly 26:13 107:3 145:14 186:18	properties 208:10 proportionally 207:3 proposal 12:9 13:11,20 19:11 29:14 30:17 40:15 49:14 63:21 72:22 75:7 138:15,21 161:6 179:4,20 182:17 186:18 190:8,14 196:19 198:12 198:25 201:2 206:10,16 209:15,20 212:4,11,15 214:21 216:21 216:22 219:8 256:13 265:11 proposals 9:11 76:23 170:19 178:1,5 190:12 192:11 195:5 195:21 196:6 198:2,17 218:22 226:6 227:13 propose 57:24 61:24 64:10 71:23 72:3 104:3 140:13 163:3 191:19 197:15 200:16
--	---	---	--

[propose - provisions]

209:25 proposed 1:10 6:25 16:18 17:15,23 19:6 19:6,8 21:15 21:19 23:20 26:10 28:5,18 29:7,22 30:1,6 31:12 33:17 34:12 35:1,18 36:1 37:1 47:12,15 50:4 50:25 51:5 52:2,8,12 55:6 57:14 61:16,25 62:16,20,23 63:2,13 68:2 69:17,19 70:3 70:17 71:12,16 71:18 72:9 74:1 77:1,4 78:12,12 80:20 86:18,21 97:4 100:10 101:21 102:15 104:5,9 105:21 106:5,9 109:12 115:22 116:25 117:6 118:1 126:4,15 138:11 140:11 140:14 143:3,5 144:23 145:20 148:6,7 155:19 156:22 160:8 160:12 162:17	162:22,22 168:7,10 172:1 177:1 178:20 178:20 180:19 182:2 183:21 187:1,15 188:10 190:5 190:18 191:6 193:22 194:21 196:4,15,22 197:8,19 198:13,19,22 199:16,19 200:15 201:1 202:16 206:20 206:25 207:14 207:17 208:3 208:12 212:3 212:11 214:11 215:2,7 217:24 221:23 223:19 223:23 225:10 226:11,16 240:3 241:1,18 242:5 248:7 254:14 260:24 261:1,5,11,16 265:3 269:9 270:15,18 283:18 284:19 proposes 63:1,5 71:11 72:8 139:21 146:8 219:9	proposing 16:19 20:6 31:1 36:18 132:2 138:20 142:16 158:17 190:25 proposition 261:10 proprietary 43:10 protect 99:13 164:9 171:2 179:8 240:7 249:17 283:21 protected 24:13 protection 240:15 279:1 protective 24:21 prove 24:8 76:16 91:21 proven 222:20 provide 40:10 65:18 101:19 123:12 127:6,8 128:21 131:1 133:22 137:16 139:25 142:17 143:13 158:20 167:12 172:25 194:17,24 201:4 203:25 205:2,9 240:15 248:24 269:14	269:19,20,25 270:7 provided 36:9 47:9 69:25 70:1 100:16 129:4 130:19 158:14 205:11 206:24 240:24 258:23 265:16 265:17 270:21 273:3 278:22 providers 7:6 provides 25:4 64:23 72:10 73:15 123:16 146:8 196:2 217:12 223:23 providing 206:12 provision 17:1 18:10,17 23:17 23:18,24 25:13 31:18 33:3,13 34:16 36:25 57:21 58:23 62:16 69:2,25 70:21 71:7 96:5,9 122:15 123:15 124:18 124:23 125:12 128:12 129:19 131:4 155:2 179:22 183:22 provisions 25:10 29:12
--	--	---	--

[provisions - questions]

50:15 61:18 71:14 124:14 209:23 258:9 258:15 262:12 proxies 93:4 prudent 56:25 57:16 80:25 81:24 82:16 92:17 223:14 public 1:1 5:9 5:10,17 8:9 10:15,20 11:2 11:6,12 14:11 43:3,11 72:5 75:12 109:6 155:15 164:9 167:18 170:1 221:12 238:17 238:23,24,25 239:1,8,10 240:17 241:21 242:8 248:16 248:18 249:4 249:23 250:2 253:22 281:23 287:6 published 235:15 puff 220:17 pull 17:18 65:4 66:7 70:13 97:12 112:19 147:6 154:13 163:24 166:22 243:7 261:7	262:16 pulling 69:7 pump 228:21 273:25 pumps 184:12 220:8 236:8 punch 18:5 punish 229:12 pure 202:23 purging 269:4 purpose 18:16 84:1,5 91:24 125:2 175:16 175:21 179:21 179:24 285:23 purposes 18:13 18:15 19:19 68:13 70:20 105:10 121:15 169:18 177:1 179:16 180:4 180:16 182:1,7 183:10 190:9 209:11 213:13 260:20 261:6 261:15 263:8 284:25 285:10 pursuant 5:12 73:17 239:3 pursued 219:23 purvis 48:13 49:7 53:8 69:9 230:16 231:15 push 112:10	put 7:5 8:20,22 8:24 14:20 24:16 25:1 35:13 46:11,22 53:13 64:19 72:16 75:13,23 112:22 113:23 117:12 120:16 132:23 140:6 164:14 168:25 248:20 252:13 255:2 272:6 puts 49:19 putting 94:2 130:6 142:6 191:14 262:14 269:12	question 53:10 66:24 80:18 83:1 89:9 94:7 94:9 98:17 101:6 107:11 108:2,10 109:19 116:20 118:10 122:4 124:10 126:5 132:13 147:20 153:6 156:25 159:23 160:23 161:16 162:24 163:24 165:12 165:15 259:16 269:18 280:14 questioned 50:13 questioning 111:20 questions 61:1 61:6 73:7 76:25 77:11,15 77:17,23 78:23 87:11 94:5 97:10 100:2 105:16,18 108:22 109:4 110:12,15,17 110:19,25 111:5 114:7,13 114:14 116:2,9 116:11 119:13 120:10,20,25 128:25 131:19
		q	
		quadruple 144:12 qualifications 136:19 qualified 212:17 qualify 89:22 105:1 qualifying 83:9 quality 10:11 239:25 249:6 250:25 quantify 278:8 quarter 228:18 265:7 query 112:18 152:13	

[questions - really]

134:2,6,11,12 134:13,17 146:25 148:24 149:4,11 155:9 155:10 157:16 157:19,21 158:1,4,8,13,23 158:25 159:6 159:10 163:7 163:10 166:12 210:16 224:18 287:3 quick 36:13 41:20,22 45:4 quicker 20:18 127:22 quickly 155:18 189:14 208:24 237:5 285:7 quit 10:25 quite 55:15 77:22 79:14 257:18 quote 88:19 101:15 262:13 268:7 quotes 88:19	railroad 202:22 rainbow 65:5 rainbows 65:6 raise 9:8 11:15 253:24 raised 8:6 10:3 11:16 25:9 134:11 283:2 283:25 285:2 raising 59:4 192:17 ran 84:23 244:7 ranch 228:20 range 47:1,3 55:23 88:2 90:14 105:6 120:2 147:16 172:23 rank 10:21 rankin 2:22 4:7 4:10 14:13,14 15:8,12 42:9 60:24 61:4 66:24 78:4,6 99:5 113:10 116:4,5,7 120:20 121:4 135:8 rankin's 154:13 rate 252:11 277:3 rates 273:1 276:18	rather 26:6 33:24 54:25 93:5,18 110:8 227:9 282:12 rationale 36:13 138:18,19 177:19 reach 28:1 36:19 45:9 61:18 121:20 127:19 reached 177:21 235:16 238:23 reaching 45:12 79:16 205:7 reactivated 220:7 reactivation 186:1 223:14 reactivations 147:22 148:12 148:18 read 20:9 52:5 62:6 65:16 66:9 67:4 68:18 69:12 70:8,22 73:3 169:10 170:14 198:14 219:4 256:19 270:23 reading 25:22 50:8 114:21 191:4,4 ready 6:21	real 36:13 41:22 216:1 236:23 244:14 realistic 14:3 realities 178:13 192:7 227:22 reality 215:4 realizing 77:20 really 17:9 19:15 20:15 33:2,4 35:14 43:15 46:10 53:10 55:4 61:16 74:6 97:25 100:17 120:5 122:24 122:24,24 124:22 129:7 133:22 137:10 142:21 161:2 162:23 164:18 165:5,11,16 170:3,4,11,20 172:3,25 175:21,23 176:16,24 178:9 180:25 182:18 194:11 197:24 204:2 205:25 208:13 217:4 222:11 250:12 251:8 252:10,12,18 253:10 268:17 281:16,19
r			
r 2:1 3:1 7:20 9:21,21 11:22 135:24 241:10 241:10 247:22 254:7 radius 232:15 233:2,9,24			

[really - redoing]

282:10 reap 242:24 reason 83:18 85:2,5 108:12 110:6 121:9 122:12 135:4 138:18 148:17 149:18 150:16 153:22,24 154:9 166:14 196:10 221:21 252:10 reasonable 12:6 76:10 105:23 107:6 154:8 183:6 217:20 263:13 264:14 reasons 21:24 28:16 29:17 31:3 39:25 41:17 44:1,3 44:23 83:21 84:7 90:22 104:25 105:3 139:2 149:22 150:18 153:3 225:19 240:23 240:23 263:4 285:3 rebut 183:7 265:11,16 rebuttable 265:2 277:25	rebuttal 4:21 16:10 38:23,25 39:8 40:4 47:11 48:2 52:5 69:3,8,11 75:20 78:15,16 84:16 143:2 146:14 183:1 218:11 228:5 238:3,5,14 255:24 256:2 256:17 258:16 258:19 261:19 262:13 278:4 279:7,17,24 284:19 recall 22:11 50:18 54:7 116:11,18 159:20 191:7 268:8 received 272:17 recent 40:24 42:25 86:6,7 97:1 103:15 242:17 251:2 recently 57:4 251:14 recess 78:2 135:7 174:12 238:19 reclamation 12:8,17 205:16 219:16 221:16	221:20 222:17 232:10 272:9 272:23 reclassification 224:20 recognize 223:2 recognized 181:7 264:12 recommend 115:19 182:6 214:20 215:11 recommendat... 109:10 146:4,5 181:22 214:17 215:17 216:8 216:18 217:8 217:21 222:24 222:25 225:6 225:24 263:21 263:22 280:6 282:20 recommendat... 9:5 58:2 183:20 191:18 205:2,4,6 209:14 213:9 213:11 222:3,5 279:9 recommended 115:5 219:18 recommending 216:9 recommends 218:17,25	219:6,16 225:16 record 5:1 15:14 25:16 38:16 58:9 78:11 80:15 135:12,22 238:8 recording 103:16 records 217:14 218:5 recover 21:6 146:1,2 recovery 21:2 132:20 139:4 140:22 141:3,7 141:9,25 142:2 146:2 150:3,7 161:23 284:22 285:1 recreational 244:21 red 138:16 144:3 161:7 162:22 197:8 redevelopment 232:16 233:2 redirect 4:10 4:14 116:4,6 158:7,10 165:13 redlands 244:2 redoing 184:10
--	--	---	---

[reduce - relative]

<p>reduce 125:20 203:20 217:14</p> <p>reduced 217:12</p> <p>reducing 13:21 59:12 60:3 107:1 125:22 228:1</p> <p>reduction 12:22 217:16</p> <p>refer 84:24 85:3,25 97:12 257:21</p> <p>reference 75:18 157:12 189:17 209:2,10 224:9</p> <p>referenced 84:14 96:16 258:20</p> <p>references 157:4 189:8 208:5,25 209:20 262:18</p> <p>referred 267:11 267:12</p> <p>referring 98:10 106:7</p> <p>refine 282:6</p> <p>refining 128:20 222:14</p> <p>reflect 178:7 206:20 216:5</p> <p>reflected 181:3</p> <p>reform 13:10</p> <p>reforms 204:11</p>	<p>refrac 41:16 84:2 100:21 113:23</p> <p>refracked 41:13</p> <p>refracs 186:1</p> <p>refracts 111:14 112:12</p> <p>refractures 284:24</p> <p>refresh 75:25</p> <p>refuse 204:25</p> <p>refute 183:3</p> <p>refuted 186:12</p> <p>regard 16:23 20:24 153:3</p> <p>regarding 26:10 28:18 48:11 158:13 190:8 208:12 217:8 238:21</p> <p>regardless 100:1 199:7</p> <p>regards 121:18 132:1</p> <p>regimes 178:7</p> <p>region 286:16</p> <p>regionally 13:13</p> <p>register 279:9</p> <p>registered 97:16 109:16 136:21 176:6,8 199:6 257:7</p>	<p>registering 227:5</p> <p>registration 26:10 28:12,20 28:22 45:17 50:14 54:7 109:14 177:15 209:25 217:24 227:2</p> <p>regs 124:9</p> <p>regulated 130:25</p> <p>regulating 9:1</p> <p>regulation 137:18,23 231:5 245:9</p> <p>regulations 8:12,14,16 11:5 27:18 128:14 157:9 157:10 168:9 170:16 173:16 209:9 214:5 228:9,10 229:8 229:9 230:21 231:10 240:3 240:14 245:18 282:2</p> <p>regulator 22:11 32:11 102:23 172:16 269:22 270:1</p> <p>regulators 13:25</p>	<p>regulatory 13:7 27:13 32:10 40:21 130:5 136:15,24 139:16 142:9 167:8 178:14 181:16 185:11 192:7 208:5 213:18 215:17 227:9 228:8 269:21,23</p> <p>reject 181:25 182:9 183:23 213:12,21 216:19 223:22 226:16 279:18 279:25</p> <p>rejected 209:18 215:13</p> <p>rejecting 123:6 182:6 214:20</p> <p>related 82:14 91:8 104:17 177:1 179:16 182:15 185:11 190:10,11 213:13 214:8 226:7 230:15 288:13</p> <p>relates 23:19 226:8</p> <p>relating 5:6</p> <p>relations 12:4</p> <p>relative 205:22</p>
--	--	---	---

[relatively - requirements]

<p>relatively 79:15 233:19 273:1</p> <p>released 151:21</p> <p>releasing 227:6 248:17</p> <p>relevant 34:2 69:17 146:9 258:9 275:8</p> <p>reliance 219:21 221:5</p> <p>relied 259:10 259:18</p> <p>relies 237:18</p> <p>reluctant 269:8</p> <p>rely 252:19</p> <p>relying 222:20</p> <p>remain 23:9 24:17 25:4 64:15,23 148:6 178:12 225:3 283:12</p> <p>remaining 76:12</p> <p>remains 13:4</p> <p>remarks 228:6</p> <p>remediate 72:14 143:8 221:3,8</p> <p>remediated 221:13</p> <p>remediation 271:25</p> <p>remember 54:7 103:11 127:20 127:23 129:5</p>	<p>130:22 169:24</p> <p>remembering 267:2</p> <p>remind 69:6</p> <p>remotely 14:19</p> <p>removal 17:5,6 30:6,14 32:3,4 177:10 208:13 209:18</p> <p>remove 32:5 59:2 63:5,6,14 72:19 201:5</p> <p>removed 214:7</p> <p>removes 208:3 223:5</p> <p>renewal 71:11 72:19,23</p> <p>renewed 72:4</p> <p>renumbering 31:7</p> <p>repeat 18:8 26:14 27:1 28:24 259:16</p> <p>repeated 203:13</p> <p>repercussions 193:10</p> <p>replace 106:5 106:13,18 122:23 252:3</p> <p>report 170:9,12 170:14 191:7 212:25 218:16 218:25 219:2,4 219:6,9,13,16</p>	<p>219:19 225:16 264:23 270:24 271:1,9,19 275:13,14,15 275:16 277:8 288:7</p> <p>report's 225:24</p> <p>reported 90:6 98:2 160:5,15 177:21</p> <p>reporting 98:1 213:24 217:22 222:16 224:17</p> <p>reports 211:24 226:10</p> <p>represent 109:6 111:11 152:12 155:15 188:4 193:8 255:21</p> <p>representative 148:18</p> <p>represented 143:24 144:3</p> <p>representing 167:9</p> <p>represents 71:17,21 167:11 273:5</p> <p>reputation 81:22</p> <p>request 35:5,5 140:4 189:7,16</p> <p>requested 37:3 75:2</p>	<p>requests 140:2 188:24</p> <p>require 7:6 50:16 65:25 66:4,15 75:1 77:2,4 91:10 139:21 188:22 200:5 201:2 203:17 216:15 216:17,21,23 246:21 247:6</p> <p>required 7:8 25:6 33:14 63:15 67:24 82:23 85:17 92:22 183:14 196:13 199:20 211:7 240:13 240:15 268:3 275:4</p> <p>requirement 17:4,7 23:25 26:11 29:4 58:22 72:25 199:6 215:9 216:4</p> <p>requirements 12:10 13:15 28:19 35:11 55:15 62:17 168:13 177:9 177:13,14 187:3 188:5 189:10 195:22 196:8,16,18,20</p>
---	--	---	---

[requirements - revamp]

196:20 197:2,6 197:16 198:3,5 198:11,24 199:2,8 200:17 201:3 203:11 205:9,13 207:9 207:15,20 209:1,16,21 210:1,19 211:8 211:18 212:14 213:17,20,22 214:19 215:13 217:25 220:21 221:17 226:5 227:5,20 requires 65:13 74:13 85:13 189:7,17 requiring 12:19 26:7 33:11 47:13,16 93:5,19 140:1 187:5 212:18 240:8 reserves 21:6 23:7,8 84:4 117:23 120:1 222:20 233:12 233:23 234:3 reservoir 101:3 120:1 122:10 185:12 191:23 225:14 279:21 280:3,11 284:21,23	285:1 reservoirs 233:11 resident 246:11 248:5 residents 240:7 240:22 251:9 resource 21:2 22:21 23:10 164:4,6,7 resources 2:10 3:8,13 12:7 21:7 22:24,25 23:3 37:18 44:21 101:8 102:13 118:2,8 120:9 146:1 164:2 165:19 167:6 179:9,11 208:1 240:8 247:10 284:10 286:11,12 respect 153:8 178:21 183:20 194:24 209:14 223:17 225:6 234:18 respiratory 249:8 respond 95:3 95:22 responding 51:22 279:8 response 47:8 47:22,23 57:23	107:21 111:19 129:9 130:21 143:3 159:21 162:1 230:12 responses 222:25 responsibilities 136:13 responsibility 164:8 179:8 207:24 229:7 240:6 247:3 248:21 284:8 responsible 12:16 13:20 14:3 171:3 242:16,20 247:8 254:16 responsibly 167:16 208:1 284:12 rest 5:16 76:21 130:5 restoration 13:23 240:1 273:21 274:1 restore 72:14 143:8 restored 113:22 restrict 26:25 restricting 123:3 restrictions 140:12	restrictive 46:15 result 85:18 112:12 116:13 145:21 179:5 182:2 190:12 193:11 204:8 223:16 235:20 283:4 resulted 235:21 resulting 214:24 results 139:12 186:11 resume 287:6 retain 35:4 63:1,8 138:25 140:19 retained 215:15 retaining 35:12 35:15 retention 225:14 retired 10:4,13 11:2 241:17 return 72:12 89:20 143:6 255:10 returned 92:7 159:2 returning 232:12 revamp 40:2
---	--	--	--

[revenue - risk]

revenue 13:1 13:23 87:3,8 103:6 118:8 182:5 193:11 197:4 review 30:1 32:17 34:7 35:5 37:1 38:25 40:5 73:1 76:4 81:25 91:9 92:22 99:14 118:22 126:22 127:5,8 183:11 183:13 187:22 203:14 reviewed 24:20 35:1 173:4 256:12,16 reviewing 74:7 84:22 175:9 281:23 revised 79:8 192:13 revision 31:7 68:2 revisions 26:12 73:25,25 203:13 240:3 241:1 revisit 113:9 133:11,15,16 revolution 235:21	rework 123:16 reworked 77:8 141:17 richard 109:6 155:15 rid 196:1 rig 39:24 83:25 84:6 right 6:18,20 16:3 17:10 18:22 22:17 23:10,22 24:7 25:17 30:23 31:4 34:2 35:23 36:2,4 37:6 38:13 42:2,12,18 43:10,12 45:11 46:22 47:1 49:3,4 51:13 54:9,10,12,23 55:1,2 56:1 58:8,9 59:8,17 59:21 60:1 62:21 63:3 65:3,10 67:9 68:5,15 76:15 76:24 77:22 83:1 84:6,6,14 86:4 87:9,12 88:18,19,24 89:10 91:3,5 91:18,24 94:5 94:25 97:6,8 98:20 99:17	100:25 101:14 102:3 103:22 105:1,12,16 106:15,16 107:5 108:9,9 108:13 110:11 110:18 114:1 117:10 118:12 118:16 119:11 119:17,21 120:3,14,17,22 124:17 125:21 128:4 132:7 135:2 140:15 144:1 151:2,22 153:5 154:6,17 157:5,25 164:20 167:2 180:22 183:19 185:24 186:2 191:10 196:11 197:5 199:14 202:21 207:11 209:12 213:4 215:16 227:13 230:11 234:14 237:25 243:16 248:9 250:1,7 250:22 254:11 254:13 255:10 256:25 257:11 257:16,20 258:1 260:6,11 260:22 261:2 261:13,15,23	262:21,24 263:5,12 264:9 264:18,22 266:15,15,18 267:1,14 272:14,15 275:23 276:3 276:16 277:15 279:12,12,22 285:14 287:5 rights 24:21 102:15 118:6 120:10 185:4 283:22 righty 166:13 rigid 178:3 183:23 194:20 199:10 206:17 213:15 236:10 263:1 riley 11:16,17 11:18,21,22,25 12:2,3 14:6 rio 248:6 risk 12:11 21:3 21:10 47:25 80:3 105:15 117:25 145:17 164:7 165:25 170:6,6 173:15 178:7 181:17 195:2 196:8 197:2,18 198:1 201:18 206:18 207:10 208:20
---	---	---	---

[risk - s]

215:13,23 216:5 218:1,20 220:2,5,7 221:24 222:7,8 222:9,12 226:20 227:9 227:14,19 271:5 273:6,10 276:15 278:5,8 278:12,17,18 279:2 280:7 281:3 284:19 riskier 125:16 125:17,23 riskiest 22:4 24:25 risks 13:11 184:18,20,23 185:17,19 194:19 203:7 205:22 211:17 212:10 223:12 236:19 249:2 268:18 278:24 279:3 risky 20:18,19 24:12 53:4,4 53:11 60:12,12 60:13,14 107:1 107:3 229:14 river 243:24 road 180:8 role 19:18 39:21 46:16 64:24 99:8	115:2 125:2 136:11 175:16 175:19 room 14:11 114:12 115:16 115:23 132:21 238:24 239:9 239:12 241:6 255:13 275:20 roswell 2:16 rough 103:11 roughly 271:2 272:17 routine 207:6 224:7 royalties 87:9 royalty 13:2 ruin 253:6 ruining 253:2 rule 7:1 12:13 19:6 22:14 25:13 30:23 33:6,17 34:16 35:19 43:16 45:22 46:12,25 50:4 53:20,21 54:14,23,23 55:6 60:23 63:8 64:3 65:2 65:12 66:12 67:6 70:4 73:21 74:13 78:12 79:16 82:23 85:12 93:22 101:20	102:15 115:9 115:10 116:21 116:25 117:7 118:1,12,16,25 119:2,4,7,11,16 120:11,19 130:25 131:17 133:11 144:23 145:21 154:24 158:21 159:17 159:18 164:16 170:24 172:14 172:14 176:4 209:9 226:23 241:18 242:5 243:4 248:7 249:15 254:14 274:11,12 rulemaking 7:2 16:2,18 20:17 57:14 112:24 120:14 171:14 171:17 175:19 199:10 206:11 213:10 255:25 256:14 257:2 rulemakings 18:19 115:1 167:23 rules 5:12 7:3,6 7:13 17:15 33:7 47:12,15 52:12 64:9 65:4,7,14 67:25 68:12,23	70:17 77:1,4 108:14 114:20 114:21 115:6 115:11,17,22 137:9,12 142:17 148:6,7 153:4 160:4,8 160:8,12 168:25 171:6 171:22 172:9 172:10,11,18 172:19 173:1 178:11 209:2 216:13,14 225:13 229:17 239:4 242:6 243:2 247:6 248:15 254:17 254:23 255:1 260:8,20 269:9 270:15,18 282:1 284:5,20 ruling 128:22 run 60:7 88:21 88:22 189:15 235:18 282:15 running 9:10 runs 244:12 rural 13:4 242:14 245:10 249:5 s s 1:6 2:1 3:1 11:22 239:17 241:10 247:22
---	---	--	---

<p>sad 8:8 253:8,8</p> <p>safe 38:20 83:10 103:19 230:23 249:11</p> <p>safeguarding 167:16</p> <p>safeguards 142:14,17</p> <p>safely 12:25 23:2</p> <p>saint 1:6</p> <p>sample 147:22 148:2</p> <p>san 194:14 243:19</p> <p>sand 151:14 235:12</p> <p>santa 1:7 2:4 2:11,22 3:14 10:17,24</p> <p>satisfies 216:12</p> <p>save 262:15</p> <p>saw 10:25 89:20 127:22 164:14 206:1 222:10 233:15 239:11 269:7 281:22</p> <p>sayer 3:9,12 110:17 157:24</p> <p>saying 27:6 63:24 73:6 123:1 126:8,14 132:15,18,25 133:8 191:9</p>	<p>275:18</p> <p>says 58:23 65:15 66:10 67:4,16 70:6,9 73:13 151:21 218:25 219:2,2 219:2 251:10</p> <p>scaled 204:17</p> <p>schedule 202:23 212:8</p> <p>scheduling 187:23</p> <p>scholarships 244:20</p> <p>school 10:15,17 10:25 11:2 165:24</p> <p>science 10:6</p> <p>scope 76:3 99:7 99:15 126:21 152:22 176:16 176:23 196:17 196:21 198:10</p> <p>screen 61:21 62:20 65:7,14 65:17 68:8 70:13,17 75:23 84:11,25 86:2 109:12 135:20 147:12,21 151:17 152:6 152:11 155:18 262:15</p> <p>scroll 85:25 86:6 88:9</p>	<p>se 105:6</p> <p>seasonal 185:22</p> <p>sec 229:6</p> <p>second 16:25 26:23 32:21 66:14 72:19,23 73:2 75:10 93:9 104:20 108:10 137:22 137:22 143:17 214:16 230:8 240:10 246:1</p> <p>secondary 161:14 233:14</p> <p>secretary 109:17</p> <p>section 17:24 19:5 21:14,23 26:17 27:16 30:5,14 31:11 31:13 34:4,5,6 63:6 66:5,14 67:4,5,13,16,17 67:18 68:1,8,9 69:13 70:2 71:1,23 73:12 73:13 74:5 110:9 140:15 202:4 241:1</p> <p>sections 18:5 66:9 207:2 269:9</p> <p>sector 10:14 232:11</p>	<p>secure 173:6 196:14</p> <p>secured 199:2</p> <p>securities 229:4</p> <p>see 6:19 10:23 11:15 14:10,13 22:24 26:2 27:16 30:14 35:10 39:23,25 41:13 42:24 65:8 69:15 70:14 72:15 73:6 79:3,5 80:11 84:19 86:1,7 88:7,8 88:13 91:7 104:2 108:23 122:11,24 123:1 126:11 128:24 131:7 131:12,15 132:6,25 133:7 133:18 137:11 143:23 144:9 144:11 147:21 147:24,24,25 148:1 151:18 164:3,6,6,7,17 164:21 165:18 166:1 180:7,8 184:23 211:10 212:11 218:7 219:1 234:4 239:11 249:23 252:1 254:1</p>
--	--	---	---

[see - shortly]

255:12 259:2,9 261:8 270:10 282:12 284:6 seeing 87:2 162:1 191:9 231:19 234:9 262:19 280:18 seek 74:8 138:4 seeking 19:8 26:13 64:25 65:22,24 66:2 66:3 137:25 seem 181:12 201:23 212:9 212:20 seems 48:1 seen 18:18,21 36:6 43:4 52:20,21 109:23 129:21 141:11,22 147:13 156:14 234:11 236:16 242:12 271:21 273:10 276:17 285:17 286:19 selective 237:18 sell 79:20 80:24 81:18 117:16 273:18 selling 80:4,10 81:2 273:24 send 255:3	sense 24:10 33:21 57:14 169:1 172:20 173:25 174:9 178:10 184:4 191:12,13 247:2 249:16 282:7 sensible 173:15 sensing 97:18 sensitive 18:7 37:22 45:1 48:3 116:23 117:8 sentence 72:10 73:3 sentences 131:21 separate 54:25 104:17 179:21 209:1 separately 54:16 198:17 sequence 223:7 sequestration 220:18 269:2 serious 12:12 195:7 240:19 serve 37:4 225:13 280:21 284:20 285:23 286:8 serves 33:25 49:10	services 231:17 serving 212:18 session 5:9,21 11:13,13 238:24 250:3,3 253:22 255:8 set 33:22 49:4 66:12 67:6 69:22 70:10 76:1,24 94:13 118:7 146:25 175:23 199:11 276:4 288:8 sets 62:16 183:2 186:19 215:3 settled 125:8 settlement 50:17 51:3 seven 5:8 133:12 143:6 143:10 148:4 164:21 176:24 213:11 238:20 244:6 258:2 several 52:21 59:21 84:15 150:18 160:16 178:23 232:15 shack 275:20 shale 235:21 shallow 233:19 shandler 1:24 shannon 7:16 7:17	shanor 2:15 shapes 115:15 share 61:21 84:11 109:12 127:18 135:20 151:17 155:18 177:20 193:7 shared 186:8 sharing 86:1 sharpen 51:10 sheila 5:18 11:17 135:17 239:9 243:7 shell 228:24 shift 5:25 13:14 249:25 250:8 shocking 234:20 shoot 267:21 short 15:18 21:24 47:8 78:4 79:15 146:25 174:6 186:5 232:15 233:2,9,24 237:24 264:1 281:20 shortened 227:18 shortening 187:1 223:2 shorthand 224:15 288:8 shortly 16:11
--	--	--	---

[show - slide]

show 18:12 40:18,22,25 44:17 53:5 120:17 139:9 142:19 156:17 165:5,8 204:9 211:16 242:6 showed 149:25 153:10 273:12 277:8 showing 43:3 51:21 72:5 75:10,11 97:22 111:20 118:17 118:23 119:1 143:14 223:12 shown 137:17 138:16 222:20 shows 30:9 40:6 86:5 147:14,17 153:14 164:13 197:8 198:13 shrinking 13:21 shut 90:19,21 91:23 150:19 185:24,25 233:5 263:2 shuttering 13:1 sic 113:11 251:10 sick 17:8,12 251:4	side 38:2 99:19 103:18 167:8 sides 102:23 sidewalk 286:25 sierra 6:24 243:20 248:6 sighted 186:5 237:24 sign 6:13 signa 241:6,9 241:16 signature 288:16 significance 189:13 195:24 significant 26:6 40:20 86:8 89:8 102:10 103:2 149:21 165:22 167:23 168:7 189:6 193:8,13 204:12 208:23 224:19 227:8 229:20 233:7 233:10 265:20 273:12 285:17 significantly 86:9,10,22 87:15 103:10 103:19 179:7 signing 133:24 silly 180:18	similar 54:22 57:2 72:4 81:7 95:20 97:22 138:14 179:11 182:22 203:1 210:11 277:7 284:8 similarly 106:5 simple 160:24 simplify 217:7 simplifying 47:19 simplistic 93:17 simply 223:23 237:24 248:20 simultaneous 216:15 single 64:19 98:12 104:10 104:21 123:18 190:3 201:4 216:15 223:25 235:9 256:19 257:23 258:13 singular 105:22 sir 177:23 sit 124:20 260:9 site 151:21 187:24 271:25 273:21,22 sites 242:12 sitting 112:16 243:24	situation 29:21 33:12 54:22 56:7 131:14 247:10 situations 129:13 131:12 six 98:7 113:11 126:4 164:16 233:6 258:2 sixth 217:8 size 137:20 201:15 203:21 205:24 206:22 211:19,21 215:12 229:21 sized 12:14 sizes 115:15 skip 20:11 44:1 slide 17:19 18:4 18:12 20:5,10 23:14,17 25:8 25:12 26:9,17 28:11,17,17 29:10,10,18,25 30:8,9,20,20 31:4,10,15,17 32:14,16,16 34:4,25 36:24 37:24 38:5,8 38:22,22 40:6 40:10 41:22 45:4 65:6 121:6 122:3,16 123:8 127:13 127:25 128:11
---	---	---	--

[slide - speak]

128:12 129:1 130:17 131:20 137:6 138:10 139:20 140:10 141:7 142:13 147:6 149:24 159:13 161:10 161:11 163:19 175:14 176:18 178:19 179:15 179:19 181:1,3 181:21 182:14 183:2,19 184:17 185:16 186:17,22,22 187:14 188:8 188:18,19 189:2,2,11,11 189:13,21 190:2,6,7,17 191:17 192:9 193:1 195:2,20 195:23,23 197:7,16 198:9 198:21 199:14 200:14,24 202:15 203:6,9 204:6 205:3 206:9 207:14 207:22 208:11 209:13,22 210:2,9,15,17 212:1,12 213:7 214:17 218:12 219:24 220:13	222:2 224:11 225:5 226:4 227:15 228:5 232:4 234:15 237:2,5 slides 17:20 18:6 31:3 68:4 96:21 121:5 138:14 159:10 166:22 175:9 176:12,14 226:4 230:3 slightly 30:16 slo 221:16 small 12:14 65:8 167:11 170:25 185:1 199:4 203:21 203:23 207:4,5 208:4 211:21 229:12 233:14 242:20 245:10 254:15,18,18 255:2 265:10 275:20 278:1 282:17,17 285:9,18 smaller 170:20 184:25 204:1 207:4 208:14 283:9 smart 17:9 solar 252:9 253:7,11	sold 79:24 202:7,8 sole 183:3 solely 185:20 solid 42:15 169:3 solution 13:9 173:24 solutions 288:17 somebody 170:22 218:8 253:16 286:21 someone's 51:19 76:16 somewhat 48:2 93:14 97:22 236:20 soon 24:11 129:2 sorry 16:6 20:12 61:21 66:1,20 70:12 70:15 84:8 113:10,11 132:4 245:25 sort 31:25 54:21 55:1 95:10 98:25 101:8 210:11 263:20 264:11 264:12 277:12 283:24 sorts 94:21 112:2 124:12	164:24 188:6 274:19 sound 76:4 126:23 225:3 257:20 262:21 263:5 264:17 271:5 272:1,13 279:12,22 283:12 285:14 sounded 33:18 sounds 46:6 121:21 201:14 264:8 271:7,10 271:11 272:15 source 230:25 240:21 sources 258:21 south 2:10 141:11 142:4 southeast 254:15 southeastern 243:23 southern 244:25 245:11 southwestern 234:21,22 space 167:8 187:18 spacing 37:14 37:16 141:13 141:14,15,23 speak 5:20 6:21 6:25 10:2 27:23 36:8
--	--	--	--

[speak - state]

<p>82:5 83:22 102:21 122:20 164:23 speaking 80:17 81:5 241:17 248:4 specific 8:17 9:3,13 20:25 21:13 32:19 33:10,24 35:11 37:10 40:11 46:24 83:18 85:22 93:3 95:10 98:17 100:7 107:25 108:5 119:13 143:13 152:13 153:1 158:25 191:14 211:21 216:16 223:12 262:17 265:25 278:22 282:20 specifically 36:25 46:16 71:11 95:23 108:11 147:21 149:11 152:25 153:12 168:15 191:15 272:11 specificity 33:7 33:8 131:15 specifics 44:4 83:22 122:20 153:13</p>	<p>specified 67:21 specifies 67:19 specify 66:22 67:14,20 specifying 37:3 speculate 180:18,21,21 speculation 76:7 113:15,18 286:23 speculative 46:21 121:15 180:4,16,25 181:12,13,14 181:25 182:9 214:7 234:5 236:11,20 speed 99:9 speedily 213:5 spell 5:10 6:6 9:20 11:19 15:3 135:22 174:14 239:2 239:14 241:7 243:9 246:1 247:20 250:15 254:4 spend 176:13 spending 208:21 spent 136:15 209:7 241:20 242:10 243:20 244:10 248:19</p>	<p>spike 41:21,25 42:3 spite 251:22 spoke 102:3 sponsor 245:14 252:14 spot 105:17 square 276:24 280:6 st 2:10 stability 178:10 stable 13:5 stacked 196:2 stacking 213:20 staff 200:6,7 staffing 203:18 stage 168:4 235:9,10 stages 43:24 44:1 stake 252:12 stakeholders 115:15 170:1 205:21 stamped 69:12 stand 15:1 27:19 96:9 161:7 239:13 263:7 standard 221:12 231:4 standards 12:18 181:18 216:25 231:11</p>	<p>231:13 standing 109:16 standpoint 82:9 140:8,8 172:21 211:5,9 stands 54:8 133:11 star 11:15 253:24 start 61:19 121:5 159:13 172:2 175:15 177:17 179:19 195:23 196:23 199:3 207:19 223:7 235:18 239:22 241:14 243:16 246:8 248:1 250:23 254:11 started 50:7 53:24,24 54:1 79:10 144:9 150:3 232:21 236:1 starting 142:6 190:2 196:11 218:12 223:19 279:6 starts 279:14 state 1:2 8:2,25 9:6 10:10,15 10:21 13:1,3 15:14 20:20</p>
---	---	--	--

[state - stenographic]

27:17,20 38:20 53:11 87:5,6 90:2 91:4 96:7 99:18 106:4 107:1 109:7,11 109:17 118:8 125:1 128:14 136:10 155:16 164:8 167:19 171:4 173:10 175:18 176:3,7 178:14,24 179:8 194:12 194:16 195:8 195:11,15 197:4 198:8 203:2 207:25 210:21,21 211:12,12 213:2 214:4 218:7 219:22 222:1 231:4 232:9 239:2,14 240:17 241:7 241:21 242:2 242:19 243:9 244:25 246:20 247:1,8 248:19 251:9 252:9 253:6 255:3 258:10 262:25 268:1 269:23 271:13 273:6 273:17 274:7 274:13,14,25	275:7,19 279:5 279:18,25 282:8 283:8,17 284:19 state's 59:7 167:14 205:16 205:18 207:24 240:7 271:23 272:9,23 stated 30:16 68:10,16 131:24 164:1 262:25 275:15 275:16 285:22 statement 4:4 78:15 123:2,5 165:15 166:23 167:1 263:7 statements 130:24 160:2 states 10:22 13:12 26:24 176:7 192:4 193:17 196:9 202:20 203:3 204:8 206:15 211:9 212:19 217:17 218:16 221:15 228:10 257:8,22 268:21 273:9 statewide 221:22 242:17 static 200:11	stating 279:11 statistical 259:3 statistically 40:19 statistics 165:4 258:20 status 17:6 24:5,16 25:1 25:24 34:6,14 34:24 35:19,25 36:16,25 37:9 38:6,12 43:6 46:4 50:1,5 60:1 62:2,10 62:10,12 63:8 63:10,15,25 64:8,9 65:13 65:21,25 66:3 66:11,17 67:17 67:19,20,23 72:3,20 73:1 73:17 76:13 77:7 85:19 86:18 93:3,19 95:3,23 100:4 100:11,13,18 101:10,11,15 129:6 130:8 137:8,10,13,14 137:17 138:1,5 138:8,23 140:12,16,21 141:1,8 142:15 143:10 144:7	144:16,19,20 145:13 155:21 155:22,23 156:2,6,15 157:7,8 158:18 159:19 164:4 188:25 189:19 190:5 197:10 197:20 212:22 223:25 260:6 260:10 269:12 269:17 statuses 93:4 93:18 101:17 statute 16:23 19:3 20:23 24:3,13,15 25:4 58:11 64:22 66:8,22 67:4 154:14 169:11 statutorily 169:5 statutory 17:7 123:7 169:10 169:13 171:12 171:13 stay 69:9 121:22 125:12 130:21 139:20 staying 35:7 stays 122:1 stems 171:11 stenographic 288:8
---	---	---	--

[step - substantive]

step 162:20 247:8 stepped 108:24 110:16 steps 112:2 steward 171:2 stewardships 12:7 stick 42:2 43:16 stimulate 234:13 stimulating 220:17 stop 41:15 100:6 108:1 stopping 74:7 storage 268:23 stories 113:16 story 94:2 112:6,15,21 stove 252:8 stranded 204:19 strategic 184:21 strategically 184:19 strategies 279:22 280:4 280:12 strategy 191:23 streak 134:19 134:21 streams 13:23	street 3:4 180:9 288:18 strengths 145:12 strike 19:4,10 20:23 21:22 27:17 30:18 74:1 76:24 89:8 121:14,19 122:3 128:13 129:2 131:21 187:6 strikeouts 125:25 strikes 68:2 striking 18:12 28:1 37:24 121:10 stripper 264:11 264:16,25 267:11 strong 130:20 217:14 241:18 248:7 stronger 243:1 249:17 struck 35:10 68:9 122:11 131:5 structure 95:2 95:15,20 105:21 106:9 106:17,22 217:12	structures 110:2 213:23 217:9 struggling 40:16 students 10:25 studied 55:16 studies 40:11 102:14 study 44:8 102:20 stuff 176:9 186:3 191:4 200:8 209:5 236:9,25 268:12 269:25 273:18 274:1 282:11 suazo 3:5 4:5 4:10,17 110:19 111:3,4 114:6 114:7,9 116:1 157:25 158:1 166:20,21 167:1,4 174:3 174:7,22,23 175:4 176:13 176:19 230:2,8 230:10 237:25 238:12 subdivisions 79:23 subject 66:23 69:24 71:1 76:3,6 126:22	139:22 178:18 198:10 230:19 231:9 256:13 subjective 76:15,21 126:17 subjectivity 181:16 subjects 127:22 127:23 244:2 submission 52:3 submit 5:16 90:8 97:21 137:24 188:9 239:8 submitted 190:8 submitting 211:24 subpart 21:16 23:18 25:14 subsection 30:2 63:9 65:19 69:23 70:2 72:9 74:18 138:22 140:14 212:3 subsequent 31:6 75:4 substantial 59:23 102:4 211:17 substantive 115:6
--	---	--	---

successful 139:4 150:11 sudden 165:21 sufficient 7:9 28:23 157:6 262:10 263:17 sufficiently 25:2 suggest 132:5 205:20 213:18 suggested 32:4 123:25 suggesting 132:23 277:19 277:22 suggestion 262:3 suggestions 32:25 58:15 127:6,9 suggests 224:14 suite 3:4,14 288:18 summaries 258:17 summarize 75:25 146:3 summarizes 40:5 summary 15:22 18:4 20:13 100:14 209:24 238:7 268:7 271:1	summation 57:20 summer 79:10 sun 252:6 super 221:7 258:12 supply 242:21 support 7:2 8:10 13:20 26:12 35:6 36:11 105:21 106:9,21 107:7 121:23 167:13 222:19 241:18 244:9,18,20 245:15 248:7 254:16 supported 178:21 supporting 10:10 125:11 158:21 167:18 168:1 supports 12:6 13:19 32:22 244:25 suppose 82:19 supreme 235:1 sure 8:18 9:6 16:20 19:9,24 23:6,22 30:6 30:13 35:17 36:10 38:9 48:11 55:9 60:19 62:7,9	63:22 65:18 88:18 93:7 99:6 106:24 109:21 111:7 117:14,15,18 129:11 136:12 136:20 137:9 138:13 159:24 162:25 165:3 165:12 167:10 168:25 172:9 172:19 184:7 203:10 205:5 237:6 241:9 249:18 254:22 255:1 258:18 262:20 275:12 282:12 284:9 285:7 surety 173:3 200:20 227:22 227:25 surface 21:5 118:5 188:3 221:17 273:24 surmise 52:23 surprise 107:19 surprised 98:6 107:15,16,18 surrebuttal 28:8,10 47:7,8 48:3 49:17 230:3,14 237:5 238:3,8	surrounding 52:22 81:9 survey 281:2 sustained 41:14 swear 5:12 6:15,17 7:21 9:22,24 11:23 15:5 75:15 136:1 174:18 239:4,20 241:12 243:13 246:5 247:23 250:19 254:8 sworn 15:10 136:7 175:2 synonymous 193:14 system 8:11 129:25 221:13 278:17 279:2 systems 186:1 280:19
t			
t 7:20,20 135:24 247:22 254:7 ta 24:5,16 25:1 34:6,14,24 35:7,19,25 36:16,25 38:6 38:12 45:25 46:3 50:1,5 61:20 62:18 64:8 65:13 67:25 68:11,13			

[ta - tell]

68:24 71:24 72:3,19 73:1 75:4,8,9,11 76:12 92:4 129:6 133:7 137:13 138:1 139:2,6 140:16 140:21,23 141:1 143:10 144:19,20 145:13,14 154:20 159:19 161:1,4 162:12 164:4 189:9,19 205:18 224:13 260:10 ta'd 137:19 139:11 153:9 154:3,4,6 155:1 160:17 163:4 tab 89:16 table 61:17 79:7 87:20 193:25 tables 259:7 tail 90:25 tailor 142:22 tailored 202:12 take 10:25 15:1 77:25 135:5 139:14 141:11 142:3 165:4 166:10 174:5,6 174:8,11 184:9	185:23 187:21 203:25 229:9 234:4,12 236:19 247:3 247:14 259:12 270:6,16,19 274:16 286:17 takeaway 98:20,20,25 99:4 taken 164:19 165:9 288:5 takes 37:20 124:2 140:5,9 165:19 183:17 185:2 186:3 273:15 talk 34:21 40:16 48:12 52:1 53:16 56:24 83:22 94:15 107:9 111:13 115:24 121:9 139:8 141:6 175:16 189:4 198:6 200:21 201:20 210:23,24 220:19 227:23 236:25 264:11 270:20 285:7 talked 26:19 48:21 97:23 98:19 112:5 124:16 125:15	160:2,4 163:2 179:11 197:18 204:19 205:19 220:16 262:7 263:24,25 talking 68:4 80:15,16 81:12 84:20 95:5,8 106:17 124:7,8 133:4 149:15 154:1,8 160:13 182:12 201:12 233:5 266:8,9 266:10,13 274:8 280:15 281:4,15 talks 31:18 137:23 264:21 tanks 273:25 tannis 2:5 taos 252:4 target 22:3 24:24 32:24 48:22 58:1 60:11 95:19 141:17 197:24 216:24 targeted 13:10 17:15 52:15 222:14 tas 45:25 50:9 taught 7:4 8:4 244:3 tax 13:1 182:5 193:10 197:4	taxes 87:8 taxing 252:15 taxpayer 246:11 taxpayers 246:18 248:21 249:20 teacher 10:15 teachers 10:23 teaching 11:2 244:5,5 team 40:21 90:24 teams 6:20 technical 14:12 38:1 76:5 126:23 175:25 178:12 205:21 208:21 212:23 234:16 255:11 256:18 258:13 technically 236:6 265:14 technologies 206:5 technology 8:5 12:22 22:25 39:24 139:19 179:2 230:21 236:13 237:3,7 237:12,19,23 tell 5:13 6:16 7:22 9:23,24 11:24 15:5 17:20 20:5
---	--	---	---

[tell - testimony]

30:4 48:19 57:3 60:3 85:6 88:4,5,5,20 89:4 96:13 112:6,16,21 115:8 136:1 148:21 152:1,1 171:9 174:19 181:2 239:4,20 241:12 243:13 246:6 247:24 250:20 251:11 254:9 268:15 telling 43:5 112:23 temp 23:23 temporarily 62:2 63:7,10 64:14 65:20,25 66:3,17 67:16 67:19 73:16 137:13 142:23 144:7 146:6 177:4,6 178:16 186:24 187:4 187:16 190:5 197:10,20 218:19 220:1,6 220:10 224:3 224:24 227:4 232:20 temporary 17:5 24:1 25:23 41:15 62:1,9 62:10,12 63:14	64:25 65:22 66:4,11 67:23 71:10,13 73:14 73:17 137:7,9 138:4,7,12,23 140:12 141:8 142:14 143:4 143:14 144:16 155:20,21,23 156:15,22 157:6,8 158:18 188:11,20 190:4 223:5,18 223:20 224:12 260:6,10,15 269:12,16 tempted 134:18 ten 66:18 78:1 144:8,20 151:9 194:3 208:14 209:19 242:18 tend 147:18 206:1 220:4 223:10 262:19 tends 134:9 term 22:8 72:10 132:9 169:1 172:18 178:16 180:24 181:14 182:7 193:24 214:5 223:14 225:20 225:22 229:3 234:6 268:23 272:23 276:15	279:21 280:3 280:11 terms 18:19 23:8 62:1 95:5 97:24 128:20 169:4 193:3 260:19,24 terrific 77:25 territory 8:25 198:23 tertiary 161:14 test 142:18 tested 115:17 testified 15:10 20:1 48:13 50:21 52:7 64:13,22 75:24 111:15 113:2 116:24 129:21 136:7 175:2 176:1 201:22 268:6 273:14 testify 50:20 165:5 270:23 testifying 16:2 testimony 4:21 4:21 14:23 15:24 16:6,10 16:14 28:9 31:20,21 32:3 34:10 36:18 38:23,25,25 39:4,9,12 40:4 47:9,11 49:7 49:17 50:12,18	51:25 52:6 53:8 57:23 58:16 69:3,8 69:12 70:8 75:19,20 77:12 78:13 83:8 84:15,16 94:24 98:18 99:7,16 109:8,22,23,24 113:10 114:15 118:23 121:3 123:2,24 128:19 129:4 134:2,14 137:1 137:4 143:2 146:14 147:8,9 148:9 152:23 153:8 154:17 154:19,23 155:17 162:15 162:19 163:1 163:25 166:7 166:16 170:4 175:15 176:17 176:21,23 177:22 188:9 190:8,24 191:5 196:24 205:3 206:12,14 207:13 213:6 218:10,11 220:24 225:19 230:12 234:16 234:18 237:5 238:1,4,6,8,14
---	---	---	---

[testimony - things]

238:15 255:23 255:24 256:3,6 256:9,17,22 258:7,16,20 259:2,7 262:1 262:1,5,25 263:10,18,25 264:10 273:2 277:13 278:5 278:11 283:2 283:25 285:2 285:23 286:4 287:3 testing 23:2 141:1 251:1 286:15 tethered 224:1 texas 13:15 136:13,21 150:23 202:6 202:21 230:17 245:3,7 253:2 253:4 274:13 text 71:20 thank 5:22 6:5 6:22 7:14,15 7:24 9:14,15 9:25 11:9,10 12:1,2 14:4,6 15:2,7 17:13 45:11 50:11 60:21,24 61:3 61:7,12,14 62:8 65:12 66:7,14 67:1	69:1 77:12,13 78:6,17,19 79:18 82:4 83:7 84:9 85:24 92:15 99:21 100:7 101:4 102:2 103:23 108:18 108:19,20 109:8 110:12 110:13 111:1,2 114:2,3,4 116:1,3,5 120:22 121:5,6 122:16 125:9 125:14 128:24 134:1,3,14,15 134:16 135:25 136:3,5,17 138:6 140:10 142:13 143:1 143:18 146:12 146:20,22,24 148:2,24 149:1 149:3 151:13 155:7,8,11,17 157:16,17,22 157:23 158:6,9 158:23 159:5,7 159:12,13 163:6,8,11,15 163:17,21 166:6,9,15,17 166:21 174:1,2 174:21,23	175:13 177:16 178:18 179:14 181:1 200:14 210:15 226:3 237:25 238:12 239:16,19,23 241:3,4,11 243:3,5,18 245:18,20 246:9 247:15 247:16 248:2 249:20,21 250:22 253:9 253:19 254:8 255:5,15,23 259:20 284:15 287:2,4 thanks 60:21 121:2 161:11 181:20 188:8 206:8 that'd 163:19 207:21 theory 152:15 153:1 thing 29:18 37:23 89:2 94:20 96:19 110:5 124:21 169:10,12,20 170:12 172:13 200:9,11 203:14 204:21 210:11 231:15 235:14 253:8	253:17 things 5:10 8:8 21:9 28:8 29:13 33:10 35:17 37:7 46:5 47:1,3 89:2 90:19 104:17 113:24 115:25 120:2 127:2 131:14 168:19 170:8 176:11 177:24 178:17 180:10 181:19 183:18 184:15 185:14 188:3,7 192:23 194:15 200:11 200:12,22 201:25 203:1,4 205:25 206:1,6 208:6,7,19 211:16 215:25 220:15 222:10 222:21 223:9 228:4,22 231:2 231:7 233:24 234:9 236:17 237:22 239:1 252:18 253:15 270:2,7,9,13 273:18,20 274:19 278:15 278:18 279:4 280:20 281:3,8 281:11,25
--	---	---	--

[things - thresholds]

282:6,13,14 284:9 286:17 think 8:23 19:14,21 20:1 20:23 21:3,9 21:24 23:5,14 23:15,16 25:1 25:8,13 26:17 27:4,12,14,18 28:1,12,13 29:1,1,12,18 30:5,8,21 31:1 31:15 32:7,23 33:9,16 34:25 35:18 36:6,18 37:1 38:3,7 39:14,15 40:4 40:7 42:19 44:12,16,20 45:21,24 46:9 46:10 47:23,24 48:1,10,12,21 49:2,6,12 53:2 53:3,3,5 54:22 55:4,8,23,24 56:4,8 58:19 58:20,22 59:1 59:4,14,20 60:14,16,18 61:22 62:2,22 63:17,22,24 65:9 66:25 67:10,21 68:3 70:19 74:19,23 75:15,18 76:15	76:19,20 78:16 79:9,12 81:8 82:20,21 83:6 84:19 89:8 95:18,19 96:3 96:8,8 98:18 100:9 105:3,17 106:3,23 107:4 107:6,16 108:23 110:4 110:11 111:25 112:20 115:9 115:23 118:2 122:2,8 123:1 123:19 125:13 125:20,22 126:11,12 127:9 128:4,6 129:1,24 130:3 130:23 131:4 131:15 133:1 140:3 145:11 145:18 147:25 149:15 152:22 154:14,16 156:13,14,17 157:5 161:5 162:8 163:25 164:1,4,10,13 165:14,17,18 166:2,7,19 168:8 169:20 169:24 170:3 170:11,15,19 170:23 171:4,9	171:11,15,23 171:24 174:8 177:25 180:10 184:10,17 189:20,21 190:6 191:8,8 193:13,16 196:9 200:4 202:11 203:19 213:4 217:4 220:23 222:19 226:1 230:6 233:19 234:15 237:2 250:7,8 250:12 252:12 252:25 256:15 256:21 262:25 263:10,24 268:6 272:4,5 273:8 280:15 280:17 282:3,4 thinking 40:15 54:2 270:4,8 277:13 third 17:4 46:3 96:14 104:13 104:20 215:16 218:22 240:14 thirty 183:11 thought 17:9 27:25 64:4 172:8 175:10 234:20 235:16 thoughtful 163:25	thoughts 79:8 thread 107:2 threading 106:24 124:25 threats 240:20 three 5:14 16:22 40:20,21 40:23 41:3 43:9 44:17 53:17 59:10 91:16 104:4,17 105:1,3 111:14 112:7 113:3,16 124:7 137:10 140:17,24 175:9 184:2 187:10 194:6 194:10 204:9 239:7 270:9,9 270:13 threes 43:16 threshold 49:3 58:17 59:12,12 59:16 94:8 104:14 105:20 106:6,7 199:4 199:11 219:7 225:13,25 262:3,9 263:17 264:6 thresholds 105:11 181:5 191:24 215:1,3 226:14
--	---	---	---

[thrilled - touch]

thrilled 10:8 thrive 167:19 254:23 thriving 173:21 throw 250:11 tie 12:20 tied 137:14 198:23 222:9 223:11 tier 196:12 tiered 213:22 217:8,11 tiers 217:6 tiffany 4:7 14:17,23 15:9 15:15 78:13,14 tight 183:12 till 194:9 time 11:2 14:4 14:8 22:11 26:22 28:22 31:17 33:15 37:20 39:23 40:1 43:7,10 43:11 51:18 61:13 64:1 72:11,19 76:3 77:20 79:15 86:3,15 90:24 93:1 97:4 98:12,15 100:11 103:8 106:10 108:18 111:12,21 114:2 115:14	120:9 123:16 124:24 126:21 129:8,12 131:25 132:12 136:22 139:1 139:14 141:16 143:3,21,21 144:8,11 145:10 146:7 147:16,19 148:5,11,13 152:18 156:20 163:7,16 166:7 167:24 169:25 170:23 173:17 173:25 176:13 183:17 185:2 185:17,20 187:6 197:25 202:7 205:6 209:7 218:12 238:3 239:22 241:14 242:10 243:17 245:2 245:19 246:8 248:1 250:23 254:12 255:8 257:20 260:4,9 262:15 266:8 266:20 270:7 286:17 timeframe 140:9 142:22 143:9 228:2	timeframes 154:2,8 188:4 timeline 19:18 124:22 143:5 145:16,24 158:18 timelines 139:18 142:1 187:19 188:1 timely 161:21 times 10:8 79:25 99:1 156:17 164:6 178:22 229:3 229:17,25 timing 79:6 124:8 125:7 140:5 200:1 tired 114:11 tisdell 2:6,6 4:17 255:14,15 255:18,20 259:17 284:13 284:15,17 287:2,5 title 63:6 today 11:4,13 14:16,19 16:19 57:8 109:8 112:16 113:17 121:3 124:20 155:17 163:16 163:25 165:5 166:7 167:5,9 169:1 175:6,14	206:7 220:25 228:17 236:21 238:1 248:4 255:23 263:1 263:11 268:6 270:24 273:14 today's 236:13 together 115:23 117:24 120:17 140:6 272:7 toggle 30:12 told 43:9 113:17 205:1 236:5,15 tom 147:8 tomorrow 250:4 tongue 137:14 took 54:24 85:3 85:17 90:2 101:9 144:6 150:4 154:9 tools 222:15 top 88:9 128:1 topics 45:15 torpedoes 235:4 total 54:19 98:3 102:25 103:9 103:14 totally 36:17 58:6 182:9 touch 23:5 28:13 30:10,11
---	--	---	--

[touch - two]

52:11 59:11 172:24 237:3 touched 23:24 27:18 29:13 38:7,9 40:7 194:23 209:19 touches 37:2 38:6 tough 180:5,15 181:18 183:1 191:16 192:23 211:4,22 towards 26:2 44:9 town 245:5 toxins 248:17 249:3 toys 7:5 track 46:7 tracking 192:22 212:21 transaction 80:16 81:2 82:10 transactions 79:19 82:15,24 83:4 204:13 207:6 transcript 1:13 4:3,23 5:2,11 6:7 11:20 15:4 174:14 250:16 288:1,10 transfer 28:22 192:15 212:5	transferring 207:6 227:6 transfers 192:18 212:2 219:14 translation 27:22 treated 208:21 tremaine 2:11 4:8 77:15,17 77:22 78:5,22 78:24 79:1 84:10,13 99:19 99:20,22 108:17,21 114:14 116:8 118:14 119:14 120:8 123:9 134:12 146:20 149:2 tremaine's 111:19 tremendously 8:10 tribal 242:14 249:5 274:9 tried 18:2 194:17 258:18 trigger 213:1 215:7 225:1 triggered 182:20 186:10 186:21 204:13 triggering 187:10 207:8,8	triple 144:12 tripp 2:18 trivial 224:18 trouble 96:23 true 36:3 44:15 44:25 111:24 125:23 197:21 268:10 288:9 truly 47:25 105:15 191:14 209:17 274:2,5 trump 251:20 trust 56:5 truth 5:13 6:16 7:22 9:23,24 11:24 15:6 136:1 174:19 239:5,20 241:12 243:14 246:6 247:24 250:20 254:9 try 18:7,8 32:24 69:13 112:4,20 119:23 125:1 141:24 262:14 trying 31:25 33:2 63:17,22 87:11 95:19 96:10 101:7 106:25 112:21 113:7 118:9 121:20 125:19 150:20 160:11 162:24 180:22	189:14,22 199:24,24 200:7,11 208:9 211:6,14 236:24 250:9 262:17 282:6 283:13 tubing 202:8 tucker 2:23 4:12,14 14:21 135:10,11,12 135:16,19 136:4,5,9 146:12 152:21 158:7,8,11 159:5,11 163:21 tulsa 228:15 turn 6:14 69:1 116:14 141:20 164:25 198:1 204:2 253:17 270:13 turnaround 81:11 150:21 turned 40:25 turning 62:15 71:10 135:9 turns 165:20 tutoring 244:5 two 8:2 14:16 17:5 19:16 24:2,16 25:5 25:24 34:17,24 35:8,23 37:6
---	---	---	---

[two - unit]

46:4 48:21 49:22 63:10 64:14,24 65:15 65:21 66:19,20 66:21 68:4 72:4,11 75:11 94:4 98:7 101:24 105:17 122:6,13 127:15 128:1,2 130:7 131:19 131:25 132:11 132:16,22 133:16 138:24 151:9 171:14 189:1 194:11 202:5,9 208:13 209:18 238:6 250:11,13 253:9 270:2 275:20 276:8 tying 224:24 226:4,12 286:7 type 81:23 82:10 142:12 161:18 265:15 269:13 types 36:14 161:23,24 232:6 237:16 typical 201:25 typically 187:20 200:10 202:3	u u 239:17 243:11 246:3 247:22 254:7 u.s. 176:10 230:24 281:2 uic 176:11 230:24 ultimately 13:22 90:9 170:17,18 173:2 196:1 204:15,17 213:1 251:9 umbrella 55:1 unable 57:11 unaware 107:17 uncertainty 130:5 181:16 227:7,8 unconsciona... 246:17 unconventional 202:6 234:11 uncovered 201:5 under 24:17 25:4 45:25 46:1 48:23 52:9,14 56:8 64:15,23 65:14 66:4 68:17 69:25 72:12,22 87:15 101:16	108:14 110:2,9 116:24 120:2 120:11 164:16 188:13 194:4 198:11 207:15 212:3 219:8 226:13 227:18 232:3 260:8 265:10 underation 254:1,2,5,6,10 254:13 255:6 underground 180:10 230:24 286:12 undermines 219:20 223:12 undermining 13:22 221:4 understand 8:21 20:15 24:18 37:21 38:15 48:4 50:2,21 53:20 67:2 85:24 90:12 93:7 94:23 124:25 129:10,15,20 135:15 141:19 148:23 160:11 160:12 169:12 171:20 173:8 200:2 209:8 270:1 272:4 284:2 285:8	understandable 69:11 understanding 24:14 25:3 36:16 38:19 49:24 50:3 51:12 64:13 82:22 104:19 151:23 182:16 186:9,14,15 187:8,13 191:3 193:18 understood 81:13 168:22 uneconomic 280:24 unethical 246:18 unfairly 57:22 209:3 unforeseen 225:21 unfortunate 107:20 171:23 unfortunately 160:1 237:6 266:6 unintended 20:24 41:7 203:19 214:3 217:3 unique 32:23 45:21 173:8 unit 139:10 141:12 144:5
--	--	---	--

[unit - values]

185:5 285:12 285:13,24 286:2,8 units 179:6 university 8:4 10:5 237:16 244:2 unm 244:23 unmute 5:22,23 5:25 245:22 249:24,25 unmuting 111:1 250:6 unnecessarily 197:1 198:4 206:17 216:6 229:11 unnecessary 22:12,15 117:23 205:10 unquote 101:15 unrealistic 199:10 208:16 unreasonable 264:4 unrecovered 23:6,9 117:23 unresolved 51:2,2,4 untapped 120:1 unwilling 57:11 unworkable 196:25 198:4 199:25 200:1	201:7 212:15 218:1 updates 249:15 updating 200:22 201:9 upfront 242:22 upside 119:2 upsides 118:15 118:25 119:6 uranium 253:15 urge 13:25 170:13 243:1 urges 240:2,25 urging 247:5 usa 2:20 4:20 4:20 15:17 56:4 59:14 78:21 97:16 146:19 use 18:16,19 23:2 32:23 44:9 45:21 54:6 72:1,12 75:10,14 91:11 91:20 94:18,25 97:5 102:13 104:8,9,14,22 105:1,8 122:15 130:11,13,16 143:7,11 145:15,16 153:19 161:1 162:5 165:6 168:12 173:1	177:1,2 179:9 179:16,17,20 179:22,24 180:1,4,9,13 181:5,23,25 182:8,15,20 183:21 184:13 184:21 185:9 185:17,20 186:5,13 187:9 188:23 189:9 189:18 190:9 206:6 213:12 213:14,19,21 214:11 216:19 226:13,20,24 229:3 235:10 236:10 237:1 252:6,7 260:19 261:6,17,21 263:23 265:3 265:12 269:10 269:15 277:23 281:8 283:4 285:11 286:5 used 19:19 51:1 114:23 115:6 141:11,19 170:15 176:9 180:2 183:10 184:19 189:9 189:18 192:10 217:17 221:21 238:7 240:18	uses 181:8 209:2 214:8 using 48:16 80:21 92:11 126:3 180:18 181:8 185:8 215:20 222:17 235:4 262:17 utah 202:20 utility 44:10 277:15 utilize 145:11 179:2 214:5 utilized 115:4 141:8 v v 246:4 247:21 vacationed 10:7 vaccinated 17:9 vague 66:24 224:16 valuable 172:25 value 39:6,12 39:22 44:14,21 98:8 102:25 103:6 143:14 145:10 150:5 165:23 166:4 178:5 185:10 193:3 222:1,20 values 86:5 97:20 151:1
--	---	--	---

[values - want]

154:10 variability 206:21 216:5 varies 141:24 203:2 variety 41:17 44:23 139:14 181:7 205:23 228:10,22,24 various 28:25 73:15 75:20 79:23 115:17 148:9 181:7 257:22 258:21 286:16 vary 185:21 211:19 221:18 264:24 varying 144:7 vastly 230:21 venting 115:11 verbally 188:16 verifiable 218:5 veritext 288:17 versed 88:11 version 68:23 74:12 82:7 281:14 versus 54:4,19 54:19 105:14 133:9 219:2 263:21 274:4 vertical 88:8,14 88:15 207:2	vertically 233:22 vestiges 93:1 vetted 24:19 viability 271:21 viable 178:25 182:3 185:6 195:3 216:7 222:1 223:16 225:11 265:6 283:12,20 vice 12:3 136:14 231:16 victor 246:4 video 6:11 288:5 view 36:4 39:12 39:14 44:9 48:20,25 56:25 121:13 183:8 190:13 192:11 194:19 violation 211:25 violations 208:8 212:23 virtual 1:21 253:25 visible 61:22 vista 243:20 volume 41:13 48:14,15 152:9 181:5 191:11 193:3	volumes 48:24 186:5 191:15 226:25 235:10 volumetric 279:19 280:1 volunteers 244:13 vote 216:17 243:1 249:16 voters 240:1,2 240:25	walks 228:20 267:10 wall 217:16 223:12 wallace 4:7 14:17,24,25 15:9,13,15 17:13 23:14 32:9 35:18 38:2,24 44:7 47:10 60:24 61:1,4,6,13 75:6 77:12,16 77:18,23 78:23 79:2 84:14 86:2 99:8,23 105:18 107:12 108:18,23 109:5 110:16 110:18,20 111:10 114:2 114:10 116:1,8 120:25 121:2,9 134:6,13 135:5 149:16 157:1 251:10,22 252:22 wallace's 78:13 78:15 138:15 154:19,23 wallets 249:18 walls 217:18 274:18 286:10 want 8:18,20 17:8,20 20:10
		w	
		w 7:20 243:12 wait 30:10 32:21 78:8 waiting 83:25 84:1,5 walk 17:19 20:13 21:13,18 182:16 186:23 188:19 190:1 197:7 199:15 202:15 203:8 204:6 205:3 213:8 215:18 216:20 218:13 218:24 222:4 225:7 232:6 247:12 277:5 277:17 walked 119:14 175:10 walking 118:14 277:21	

[want - welcome]

23:5 28:9 30:9 30:18 32:19 33:7 35:9,13 38:9 41:9 46:22 56:24 60:19 72:8 76:18 79:18 80:7,14 81:4 82:5,20 84:1 88:9 89:10 90:9 96:13,14 97:10 99:12,12 103:25 111:13 112:4,20,22 113:9 117:18 121:10 127:15 127:25 131:14 132:18 134:23 143:16 162:2 168:20 172:6 172:19 173:21 174:8 175:16 176:15 179:18 186:2 207:12 226:7 230:4,4 237:3 252:23 253:4 254:22 262:16,22 264:3 272:11 284:11 285:7 wanted 26:4,25 27:8 35:17 40:18 60:17 80:24 94:13 109:9 120:18	122:21 133:19 165:5 230:13 234:15 236:4 250:11 253:8 254:13 wanting 34:13 wants 35:4 131:18 251:21 waste 20:25 21:4 23:10 24:21 41:7 54:23 87:22 102:15 115:10 116:16,21 118:2,4,7,21 119:3,8 120:10 145:2,7,21 146:1 164:10 177:12 178:19 178:21,25 185:7 190:12 207:15,20 209:15 226:4,9 227:11,14 242:13 253:15 254:25 283:21 284:9 286:9 wasting 11:1 watched 154:16 watching 191:2 water 47:2 141:12 180:13 184:11 220:16 230:23,25	239:25 240:21 248:17 249:18 250:25 251:3 252:18 253:12 waterways 251:4 waving 180:23 way 7:12 22:7 28:25 32:23 33:17 35:18 55:6 58:20 67:9,10 71:5 85:21 95:18 105:9 107:6 125:4 143:22 146:7 162:13 183:7 202:12 233:9 234:13 235:11 264:15 ways 48:22 49:12 278:8 we've 18:20,24 21:2 23:15 38:9 40:23 43:24 45:5,17 45:24 49:1 52:20 57:5,8 79:14 92:24 97:22 98:17,19 100:16 114:15 114:18 126:2 132:1 139:4 141:19 161:6 162:10 163:2 166:7 167:23	168:3,4,17 169:20 196:24 201:19 213:4 220:16 225:15 234:11 238:23 282:3 wealth 252:13 wealthy 246:14 weather 188:5 website 26:3,3 websites 218:7 week 5:16 31:21 49:1 52:22 58:16 114:15,18,18 123:24 128:19 162:11 256:23 weigh 165:25 165:25 weighs 164:7 welc 26:19 30:6 45:12 79:12,13 128:17 138:15 138:21 139:21 140:11 158:13 161:6 169:22 282:9 welc's 138:11 143:3 144:23 145:20 206:16 214:11,20 234:16 283:18 welcome 19:9 79:2
---	---	--	--

[well's - wells]

well's 73:1 85:8 85:12 186:4 188:22	66:12,23 67:15 67:17,25 68:11 68:13,24 69:16 69:21,22 70:10 70:25 76:18 77:2,5,7 79:21 79:24 80:4,8 80:19,20,24 81:3,9,18 83:10,11,14,15 84:15 89:1 90:16,22 94:3 94:13,18 95:21 98:7,15 99:11 99:14 100:7,9 100:18,25 101:14 102:2,5 102:7 104:6,10 104:14,15,21 105:6,9 106:6 106:7,18 107:2 107:3 111:21 112:18,19 113:3 114:19 116:11,15,23 116:24 117:8,9 117:11,23 118:15,19 119:14,20,23 121:18 122:8 122:17 123:17 123:17 124:17 125:16,17,23 128:5,8 129:21 130:6,8 132:21	133:6,12 137:12,19,20 139:6,10,13 140:16,20,23 140:24,25 141:4,5,8,17 142:14,18 143:7,10,14 144:6,6,9,13,16 144:18,24,25 145:3,4,5,7,13 145:23 147:15 147:17 148:9 148:19 149:13 149:22 150:1,6 150:8,15,20 151:9 153:1,9 154:3,6 155:2 156:3,7 159:1 159:19 160:15 160:17,18 161:1,9,12,25 163:5 164:2,3 164:11,15,24 165:20,21 166:5 168:12 169:22 170:6 177:3 178:6 179:1,2,3,6,12 180:4 182:3,23 182:25 184:18 184:21 185:6 185:25,25 186:8,18 187:3 187:15,17	190:15 193:2,5 193:8,14,18,23 194:4,5,11,24 195:1,3,10,11 195:23 196:3,5 196:8,14,15,18 197:2,6,9,9,14 197:15,18,20 197:20,25 198:6,10,23 199:3,5,12,23 200:10 201:5,8 201:23,24 202:2,3,5,6,9 202:24 204:14 205:23 206:6 206:22 207:2 212:3,6 213:16 214:18 215:4,7 215:10 216:7 216:13 218:20 219:7,10,17,22 220:1,4,6,8,11 220:17 221:3,7 221:25 222:12 222:17 223:16 224:20 225:3 225:11,12,17 226:19 227:6,9 227:17 229:13 229:13,15,22 230:19 231:3,9 231:11,13,23 232:2,6,13,16 232:17,23
--	---	--	--

[wells - worked]

233:3,5,13 234:11 235:8 236:12 240:5 240:18,19 241:22,23,24 242:1,2,4 248:10,16,20 249:1 260:3,13 263:2 264:2,11 265:6 266:14 266:16,19,19 266:21 267:3,6 267:11,11,12 267:13 268:7 268:13,14,14 268:18,20,21 270:5,12 271:3 271:4,5,16,18 271:21 273:10 273:12 274:20 275:9 276:1,3 276:5,8,11,13 276:17,22 277:3,15 278:2 279:3 280:24 280:24 281:4 281:17,18,24 281:24 283:5 283:10,11,20 284:20 285:18 285:22 wendell 1:5 went 40:20 81:15,16 85:23 115:11 141:13	141:15 142:5 160:24 232:21 232:23 251:17 267:21,22 276:19,21,24 west 150:22 230:16 western 2:3 61:11 147:4 255:20 westernlaw.org 2:5,6,7 wheels 244:8 244:12 whipple 243:8 243:9,11,11,15 243:18,19 245:20 wholly 183:23 wide 107:5 118:19 widespread 83:2,6 225:21 wifi 143:19 wildlife 188:6 249:4 william 1:22 willing 51:25 127:5,8 168:24 willingness 61:15 wills 39:4 window 187:4 227:18 229:25 264:1,4	windows 223:3 winds 221:9 281:21 wiring 226:14 wise 119:4 wish 5:20 witness 15:7 39:1 42:1,8 46:12 52:6 69:3 108:17,19 109:10 114:3 134:15,20,25 135:23 136:2 146:21 155:7 160:2 163:8 166:17,24 172:22 174:5,8 174:16,20 175:20 239:13 257:14 273:11 witnesses 4:6 14:16 159:25 169:8 172:4,10 173:23 180:20 201:20 219:18 240:24 256:18 wonderful 251:23 wonders 243:23 word 32:4 51:3 74:11 214:7 239:18 words 63:5 68:7 70:16	112:22 113:15 262:17 work 13:25 15:22 27:23 36:23 37:21 46:7 58:13 60:22 81:5 82:20 87:13,19 90:6 92:4 100:8 101:8 113:18 114:23 116:10,14 123:21 124:2 128:21 131:2 133:2,25 134:23 141:18 160:9 161:3 164:24 168:24 176:10 180:12 183:5 185:1 187:7,17 206:22 229:4 230:18 234:5 234:23 244:14 245:4 250:5 259:25 267:22 270:14 274:5 281:14 282:3 282:21 worked 8:3 141:22 146:11 161:6 170:22 178:23 229:6 230:22 234:22 236:9 254:15
---	---	--	---

[worked - yesterday]

269:22 281:1 working 64:5 89:1 92:16 107:13,13 134:8,25 141:24 154:15 164:20 165:9 173:24 180:12 232:15 245:13 276:23 279:4 282:5 workover 91:13 101:1 workovers 100:19 111:14 112:11 124:6 works 5:25 24:15 55:10 102:8 244:16 worried 50:7 worry 17:10 18:20 140:7 worse 172:13 213:3 253:14 271:14 worst 221:9,10 273:15,15 wozniak 3:4 167:5 wrapping 129:2 wrinkle 22:20 39:1,3 wrinkle's 39:12 39:14	write 94:16 written 5:16 35:23 109:23 119:4 147:24 224:2 239:8 wrong 89:2 231:13 wrote 75:24 wtp 56:4 x x 4:1 131:8 y y 9:21 11:22 131:8 135:24 135:24 246:4 yards 228:20 yeah 20:1 28:15 30:4,11 30:13 32:21,25 42:10 46:6,9 51:15 53:12 57:12 67:1,18 70:8 85:1,1 95:16 107:10 118:11 119:5 122:21 126:11 128:11 132:7 132:25 135:2 141:14 143:16 151:24 152:4 159:12 160:14 160:23 161:10 161:11 210:11 257:6 259:17	259:21 277:2 279:24 282:15 282:19 year 10:19,22 17:5 26:7 34:15 36:1 43:1 57:6 73:5 75:8 76:12 81:10 83:12,19 86:5,8 98:4 99:2 100:3 102:6,9 103:16 124:3,6 125:5 125:7,8,11 132:16 133:5,6 133:10 148:5 149:14 151:10 152:19 156:20 175:9 178:16 190:21 232:1 236:7 249:14 252:1,2 257:19 265:2,4,7 277:14 years 8:1 10:8 24:2,16 25:5 25:24 35:8,20 35:22,23 37:8 43:23 46:4,21 57:5 63:11 64:14,24 65:15 65:21 66:18,19 66:20,21 71:25 72:4,11,23 73:5,5 75:3,9	75:11,13 86:7 90:2 97:1 101:24 102:8 115:12 124:7 127:16 128:1,2 132:1,11,14,22 133:7,13,15,16 136:15,22 137:15 138:24 140:18,24 142:3 143:6,11 143:15 144:8 144:17,20,21 147:23 148:3,4 148:5 152:16 154:10 160:6 160:16 161:18 164:12,12,16 164:17,21,21 164:25 170:23 178:2 179:3 184:2,3,3,10 189:1 193:15 214:14 231:24 232:15 233:4,6 240:16 243:20 243:21 244:6 248:18 257:5,6 263:12,21 265:8 281:20 286:8 yellow 67:17,18 yesterday 19:22 50:8,12 53:23 55:18
--	---	--	--

[yesterday - zoom]

109:24 111:12 yield 237:23 young 7:4 youth 10:12
z
z 131:8 zachary 1:24 zero 91:16 244:23 273:23 zilch 89:18,18 zombie 230:17 230:18 zones 141:17 285:25 zoom 251:1