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STATE OF NEW MEXICO
ENERGY, MINERALS, AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:
Case Nos. 24941, 24942, 24994,
24995, 25115, 25116, 25117,
25145, 25146, 25147, 25148.

HEARING

DATE: Tuesday, February 4, 2025
TIME: 8:57 a.m.
BEFORE: Hearing Examiner Gregory A. Chakalian
LOCATION: Pecos Hall, Wendell Chino Building
1220 South Saint Francis Drive
Santa Fe, NM 87505
REPORTED BY: James Cogswell
JOB NO.: 7073138

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A P P E A R A N C E S

ON BEHALF OF OXY USA INC.:

ADAM G. RANKIN, ESQUIRE
Holland & Hart LLP
110 North Guadalupe Street #1
Santa Fe, NM 87501
agrarkin@hollandhart.com
(505) 988-4421

ALSO PRESENT:

Freya Tschantz, Law Clerk
Anthony Harris, Technical Examiner
(by videoconference)
Million Gebremichael, Technical Examiner
Stephen Janacek, Witness (by videoconference)
Eduardo Seoane, Witness (by videoconference)
Stephanie Noonan, Witness (by videoconference)
Xueying Xie, Witness (by videoconference)

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E X H I B I T S

NO.	DESCRIPTION	ID/EVD
Oxy USA, Inc.:		
A	Application	8/10
B	Updated and Additional Exhibits	8/10
C	Supplemental Self-Affirmed Statement of Eduardo Seoane, Completions Engineer	8/10
D	Supplemental Self-Affirmed Statement of Xueying Xie, Reservoir Engineer	8/10
D-1	Reservoir Simulation	8/10
E	Affidavit of Notice by Mail	8/10
F	Affidavit of Notice by Publication	8/10

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P R O C E E D I N G S

THE HEARING OFFICER: Let's go on the record in case number 25054, Oxy USA. This is a continuation. The hearing began about a month ago. The technical examiners requested additional information. Oxy has provided that additional information.

I see we have four witnesses with us today. I see one that was not with us, and we need to get her sworn in and qualified as an expert if she's not already qualified. So let's get -- Mr. Janacek, would you state and spell your name for the record?

MR. JANACEK: Yes. My name is Stephen Janacek. And that is spelled S-T-E-P-H-E-N. Last name Janacek, J-A-N-A-C-E-K.

THE HEARING OFFICER: Okay. And then I see Mr. Eduardo with us. Would you state and spell your name?

MR. SEOANE: Yes. Good morning. My name is Eduardo Seoane. Last name Seoane, which is S-E-O-A-N-E. First name Eduardo, E-G-U-A-R-D-O.

THE HEARING OFFICER: And then I see Ms. Noonan with us. Would you state and spell your name, please?

MS. NOONAN: Stephanie Noonan,

1 S-T-E-P-H-A-N-I-E N-O-O-N-A-N.

2 THE HEARING OFFICER: And then I see a
3 new witness with us. Would you state and spell your
4 name, please?

5 MS. XIE: Xueying Xie, X-U-E-Y-I-N-G
6 X-I-E.

7 THE HEARING OFFICER: Thank you. Now,
8 how do you say your last name?

9 MS. XIE: Xie.

10 THE HEARING OFFICER: Okay. Perfect.
11 Ms. Xie, how -- are you qualified as an expert?
12 Before this division?

13 MS. XIE: Yes.

14 THE HEARING OFFICER: Oh, you are?
15 Okay. Good.

16 MS. XIE: Yes.

17 THE HEARING OFFICER: In which field?
18 In which field?

19 MS. XIE: In the -- in the same -- for
20 the same kind of permit. It's high pressure gas
21 injection.

22 THE HEARING OFFICER: Oh, yes. Okay.
23 That's wonderful. But what is the name of the field
24 that you are an expert in?

25 MS. XIE: Oh. That's the Cedar Canyon.

1 MR. RANKIN: So yeah. It was the Cedar
2 Canyon field, but she is a reservoir engineer.

3 THE HEARING OFFICER: That's what I'm
4 trying to get at.

5 MR. RANKIN: Yeah. Yeah.

6 MS. XIE: Oh, okay. Reservoir
7 engineer.

8 THE HEARING OFFICER: A reservoir
9 engineer. Would you just go over just generally your
10 education and work experience that qualify you as a
11 reservoir engineer?

12 MS. XIE: Okay. I have a Ph.D. as a
13 engineer from Rice University in Houston. I worked
14 for Shell for 11 years, from -- from 2005 to 2016 as a
15 reservoir engineer for different basins. And then in
16 2016, I joined Oxy as a technical leader, also as a
17 reservoir engineer for Permian unconventional
18 development.

19 THE HEARING OFFICER: Perfect. Let's
20 get you -- let's get everyone sworn in again. It's
21 been about a month. And, normally, I wouldn't swear
22 you in a second time, but it's been such a long time.

23 So would everyone raise your right
24 hands, please? Do you swear or affirm under penalty
25 of perjury that the testimony you're about to give is

1 the truth, the whole truth, and nothing but the truth?

2 MULTIPLE SPEAKERS: Yes.

3 THE HEARING OFFICER: Okay. I heard
4 four yeses, so everyone is now sworn in.

5 Now, Mr. Rankin, do you want to give us
6 a short reorientation of where we are in this case?

7 MR. RANKIN: Sure, Mr. Examiner. Thank
8 you very much. Mr. Examiner, we had submitted initial
9 exhibits in this case, Exhibits A and B, in advance of
10 the last hearing in January. Those exhibits were
11 admitted to the record.

12 The division undertook cross-
13 examination of Oxy's experts and witnesses on several
14 issues relating to the proposed pilot project. The
15 pilot project, as a reminder, is a -- involves a plan
16 to re-inject produced gas into a single well within a
17 project area, and then to produce oil from that same
18 well simultaneously while the produced gas is being
19 injected.

20 It's a advanced or new technology that
21 Oxy is intending to evaluate for -- to determine
22 whether it's a potential new EOR or advanced oil
23 recovery technique that it may be able to apply more
24 broadly. And so they are eager to undertake this
25 effort to -- under this pilot project to evaluate the

1 potential for this technology.

2 So we presented evidence and the
3 witnesses at hearing in January. Division had some
4 additional questions about several things, including
5 completions issues, construction of the well bore,
6 management of the well bore, and then also some
7 additional reservoir engineering questions.

8 The Division submitted those questions
9 to us in writing by email so that Oxy would be able to
10 prepare, in advance, exhibits and additional
11 testimony. And then, so we did review those questions
12 and presented additional testimony and some exhibits
13 that were filed last week in advance of the state's
14 hearing.

15 We filed on Thursday last week a notice
16 of supplemental exhibits and a revised exhibit packet.
17 The exhibit packet has Exhibits A, B, and then
18 supplemental Exhibits C, D, and D-1 as well. And then
19 Exhibits E and F, which were previously presented,
20 which are the notice exhibits for both proof of
21 mailing certified mail, and then also proof of notice
22 by publication.

23 (Exhibits A through F were marked for
24 identification.)

25 MR. RANKIN: So Exhibit C, D, and D-1,

1 Mr. Examiner, are the revised additional or
2 supplemental exhibits. Exhibit C is a supplemental
3 self-affirmed statement of Eduardo Seoane. He's the
4 completions engineer who previously testified. He
5 addresses many of the questions that were posed by
6 Mister -- Examiner Harris in the Division.

7 And then Exhibit D is the supplemental
8 self-affirmed statement of Xueying Xie. She's the
9 reservoir engineer who is addressing the reservoir
10 engineering questions that were raised by the Division
11 as well. She has an exhibit that is a image from the
12 reservoir simulation explaining to some extent how the
13 simulation was conducted.

14 With that, Mr. Examiner, I'm hoping
15 that the Division had time to review the questions
16 and, I'll make both of our -- all four of our
17 witnesses available, as a panel, for any additional
18 questions that the Division may have.

19 THE HEARING OFFICER: Thank you,
20 Mr. Rankin. Let's get those exhibits admitted into
21 evidence before we go any further. So Mr. Rankin, why
22 don't you offer them up?

23 MR. RANKIN: Sure. Mr. Examiner, I'd
24 move for the admission of Exhibits A through F and
25 their attachments for admission into the record.

1 THE HEARING OFFICER: Hearing no
2 objection, they are admitted into evidence.

3 (Exhibits A through F were received
4 into evidence.)

5 THE HEARING OFFICER: What I'd like to
6 do is for the new exhibits, I think you said they were
7 C and D? I'm not worried about E and F right now.

8 MR. RANKIN: Correct. C and D are the
9 new exhibits.

10 THE HEARING OFFICER: Yep. And D-1?

11 MR. RANKIN: Yep.

12 THE HEARING OFFICER: Who are the
13 authors of C, D, and D-1?

14 MR. RANKIN: So Exhibit C is the self-
15 affirmed statement of Mr. Eduardo Seoane.

16 THE HEARING OFFICER: Okay.

17 MR. RANKIN: So he's the author of that
18 one. The second is Exhibit D, and that's from Xueying
19 Xie, and she's the reservoir engineer.

20 THE HEARING OFFICER: And what is D-1?

21 MR. RANKIN: D-1 is her exhibit that
22 goes along with her self-affirmed statement.

23 THE HEARING OFFICER: Okay. Let's call
24 Mr. Seoane and get him to adopt his submissions under
25 oath, make any corrections necessary. And then we'll

1 do the same for Ms. Xueying.

2 MR. RANKIN: Xueying is her first name.
3 Xueying. And then -- I'm -- my son is taking
4 Mandarin, so I'm trying to get my pronunciation
5 better. But it's -- I think it's Xie. But Xueying
6 can give us the correct pronunciation. I'm working
7 really hard on it.

8 THE HEARING OFFICER: Oh. Is it Xie?
9 Xie. Okay. Thank you. So let's start with
10 Mr. Seoane. Would you call Mr. Seoane and --

11 MR. RANKIN: Mr. Seoane, will you
12 please state your name for the record?

13 MR. SEOANE: Yes, my name is Eduardo
14 Seoane.

15 MR. RANKIN: Mr. Seoane, did you
16 prepare what's been marked as supplemental Exhibit C
17 that was filed with the Division?

18 MR. SEOANE: Yes. Correct.

19 MR. RANKIN: Do you adopt that
20 testimony as your testimony today?

21 MR. SEOANE: Yes.

22 MR. RANKIN: Do you have any changes or
23 corrections to that testimony that you would like to
24 bring to the attention of the examiners?

25 MR. SEOANE: No.

1 MR. RANKIN: At this time,
2 Mr. Examiner, I'll make Mr. Seoane available for
3 cross-examination based on his self-affirmed
4 statement.

5 THE HEARING OFFICER: Okay. And let's
6 do the same with Ms. Xie.

7 MR. RANKIN: Okay. Ms. Xie, did you
8 prepare what's been marked as supplemental Exhibit D
9 and filed with the Division?

10 MS. XIE: Yes.

11 MR. RANKIN: Did you also prepare
12 what's been attached as Exhibit D-1?

13 MS. XIE: Yes.

14 MR. RANKIN: Do you have any -- do you
15 adopt your testimony that you have included as
16 Exhibit D as your testimony today?

17 MS. XIE: Yes.

18 MR. RANKIN: Do you have any
19 corrections or changes to your testimony or to the
20 exhibit that you attached?

21 MS. XIE: No.

22 MR. RANKIN: At this time,
23 Mr. Examiner, I would move or make her available for
24 any cross-examination, and I'll do so for the whole
25 panel.

1 THE HEARING OFFICER: Perfect. Thank
2 you. Mr. Harris, do we have you?

3 MR. HARRIS: Yes.

4 THE HEARING OFFICER: Can you -- okay.
5 Perfect.

6 Freya, would you add his image to the
7 screen? Okay. Perfect.

8 Okay. Who wants to go first,
9 Mr. Gebremichael, you or Mr. Harris?

10 MR. GEBREMICHAEL: It's going to be --
11 I don't have any questions.

12 THE HEARING OFFICER: Oh, okay.

13 MR. GEBREMICHAEL: There's going to be
14 a question from --

15 THE HEARING OFFICER: From Mr. Harris.
16 Okay. Mr. Harris, you can ask your question to the
17 panel, or you can ask your question to an individual
18 on the panel. It's up to you.

19 MR. HARRIS: Okay. Thank you. I think
20 just a couple of questions from Mr. Seoane. From your
21 supplemental exhibit package, if I could draw your
22 attention to page 88 of 111.

23 MR. SEOANE: Oh, sorry. I don't -- let
24 me see. I don't have the package here in front of me,
25 so it's going to take me couple seconds.

1 MR. HARRIS: That's okay. It's on the
2 screen.

3 MR. SEOANE: I have the question.
4 Yeah. I have the question. Oh, okay. You got it
5 there on the screen. Perfect.

6 MR. HARRIS: Okay. If we could just
7 scroll towards the bottom, please. Yeah. Okay. So
8 just up a little bit, please.

9 Just want to confirm the pressure
10 rating for the wellhead spool and the side outlet
11 valves for the candidate well is 5,000 PSI. But is
12 this a standard design for all the wells proposed in
13 this project?

14 MR. SEOANE: Yes. It's -- it's the
15 same design. It's the same vintage of -- of wells.
16 Correct.

17 MR. HARRIS: Okay. Very good.
18 Scrolling down to page 89, I noticed that your -- the
19 plan has changed from two and seven-eighths tubing
20 down to two and three-eighths or -- yeah -- two and
21 three-eighths. So the original plan was for two and
22 seven-eighths. Is there any reason for the decreased
23 diameter? Is it for --

24 MR. SEOANE: No. No. So I think -- so
25 that was a typo. Initially was two and three-eighths

1 for the plan to be able to fit the swellable packers
2 into the five and a half inch casing.

3 MR. HARRIS: Okay. Okay. So your
4 diameter, obviously, will be smaller than the two and
5 seven-eighths that was originally mentioned in the
6 package. So in terms of when we get into the details
7 of, eventually, the plug and abandonment of this,
8 well, do you see any issues with getting cutting tools
9 inside that reduced diameter to be able to cut the
10 tubing?

11 MR. SEOANE: No. No. We do it all the
12 time in EOR in Permian, so no issues with -- with
13 that.

14 MR. HARRIS: Okay. Very good.

15 I guess in -- if I could -- if we could
16 go to page -- bear with me for a moment here -- to
17 page 96, the exhibit package. And at the bottom of
18 that page you've got a diagram. Yeah, there we go.

19 So your current plan right now, as
20 stated in your exhibit packet, you have no intention
21 to recover the section below the production packer and
22 leading down to the swell packers. That section would
23 not be recovered.

24 But just as a reminder here is that one
25 of the requirements we will have in the order, which

1 is consistent with our new plugging -- the New Mexico
2 Oil Conservation Division's new plugging and
3 abandonment conditions of approval, is that for
4 horizontal wells, we do require the heel section of
5 the well to be plugged and filled with cement.

6 So in keeping with that, it will be
7 necessary to remove what I would call the intermediate
8 section of tubing between the production packer and
9 the uppermost swell packer. Just want to make that
10 clear that that'll be a condition in --

11 MR. SEOANE: Okay.

12 MR. HARRIS: -- should this proposal be
13 approved. Do you have any concerns with that?

14 MR. SEOANE: No, no. No concerns.

15 MR. HARRIS: Okay. And the fact that
16 it's two and three-eighths versus two and seven-
17 eighths, no concerns with being able to access that
18 either with a wire line, conveyor tractor, or whatever
19 means may be necessary to cut that tubing in the
20 horizontal section?

21 MR. SEOANE: Not at all with -- with
22 coil. Correct.

23 MR. HARRIS: Okay. So you would use
24 coil to cut that?

25 MR. SEOANE: Yes. We can use coil to

1 cut it. Or we can go in and try to latch on the
2 tubing and burn through the packer and basically
3 remove it. So no -- no concerns with that.

4 MR. HARRIS: Okay. Very good. That's
5 all my questions, Mr. Examiner. Thank you.

6 THE HEARING OFFICER: Mr. Harris, thank
7 you. Mr. Gebremichael? Microphone.

8 MR. GEBREMICHAEL: Can you hear me?

9 THE HEARING OFFICER: Yes.

10 MR. GEBREMICHAEL: Yeah. So we -- OCD
11 is pretty much satisfied with the supplemental answers
12 that are provided by Oxy. As long as Mr. Harris is
13 satisfied with the response he get, I think we are
14 good to proceed with this. I don't have any
15 questions.

16 MR. RANKIN: Thank you,
17 Mr. Gebremichael.

18 THE HEARING OFFICER: Okay. Thank you
19 Mr. Gebremichael and Mr. Harris. If there are no
20 further questions for the witnesses, we will close
21 this hearing, and we will take this case --
22 Mr. Rankin?

23 MR. RANKIN: I have one -- I have one
24 issue, Mr. Examiner.

25 THE HEARING OFFICER: Yes.

1 MR. RANKIN: I would like to bring to
2 the Division's attention, this is just something that
3 I -- that actually the client identified that I hadn't
4 noticed. And that is in our notice of publication, we
5 had an incorrect range for the notice.

6 Now, I went back and confirmed that
7 each of the affected parties actually did get notice
8 and received -- we have confirmation that they
9 received certified mail. But so, I mean, my --
10 because it's a -- because notification is a
11 requirement for injection by publication. I just want
12 to make sure there's no issues.

13 I propose to reissue notice by
14 publication just to make sure there's no issues with
15 the correct range. I would like to be able to do that
16 without holding up the Division's review. And if I
17 might ask for a special docket or to have this on the,
18 you know, on the -- March is a long way away. But as
19 long as it doesn't hold up the review of the Division,
20 I think March could be fine.

21 I just -- it would only take us about,
22 you know, less than two weeks to get this thing
23 published. And if it's possible to get this under a
24 special docket, I don't want to burden the Division
25 because there's plenty going on. So I'm also fine

1 doing it on March -- of the first docket of March.
2 But I just want to raise that for the Division.

3 THE HEARING OFFICER: I appreciate your
4 candidness. And you're saying that publication by
5 notice is a requirement for an injection, even if
6 actual notice is sufficient?

7 MR. RANKIN: That's my view.

8 THE HEARING OFFICER: Okay.

9 MR. RANKIN: Unlike a pooling order;
10 okay? A pooling order just requires notification to
11 the parties, and you rely on publication by notice
12 if -- for constructive notice if you can't find them.
13 Here, it's a separate requirement.

14 THE HEARING OFFICER: Okay.

15 MR. RANKIN: Okay.

16 THE HEARING OFFICER: Okay. So then
17 what I would propose is we can come -- we can add this
18 case to any of our dockets.

19 MR. RANKIN: Okay.

20 THE HEARING OFFICER: It doesn't have
21 to be an affidavit or a status conference. It could
22 even be a special docket so that we don't hold up the
23 review.

24 I have no control over what technical
25 examiners do in the meantime. I can't say, "Hey,

1 review this even though we're" -- that's up to them.
2 So if you publish -- when are you proposing to publish
3 notice?

4 MR. RANKIN: Well, one of the things
5 I'd like to know, Mr. Examiner, is what date I would
6 set this for so I could put the date in the
7 notification. And then I just need to confirm with
8 the newspaper how far in advance I'd need. So I
9 probably would need -- you know, I'd like to have a
10 week.

11 THE HEARING OFFICER: Right.

12 MR. RANKIN: Make sure I can get it in
13 the newspaper and then another ten business days.

14 THE HEARING OFFICER: Sure.

15 MR. RANKIN: So, you know, it could be
16 the very end of February.

17 THE HEARING OFFICER: So we're looking
18 at about three weeks from now --

19 MR. RANKIN: Yeah, yeah.

20 THE HEARING OFFICER: -- is I think
21 what I'm hearing. And that would be the end of
22 February.

23 And Freya, don't we have a docket -- is
24 it the 27th or 28th or both?

25 MS. TSCHANTZ: It's the 27th.

1 THE HEARING OFFICER: 27th. Well, do
2 you think you can make the 27th?

3 MR. RANKIN: I believe we could.

4 THE HEARING OFFICER: You can?

5 MR. RANKIN: Yeah, yeah.

6 MR. GEBREMICHAEL: But the only --
7 that -- publish so it has to --

8 MR. RANKIN: No, because it's for a
9 hearing. So we would give notice -- so I would
10 publish it. It needs to be ten -- that's for
11 administrative applications. So for hearing
12 applications, it just needs to be ten days in advance
13 of the hearing.

14 THE HEARING OFFICER: The 27th, again,
15 works for you?

16 MR. RANKIN: That would work. Yeah.
17 And just -- so to be clear, Mr. Gebremichael, just so
18 you're aware. So yeah. The difference is that
19 because this is a hearing, there is not that 15-day
20 period. It's just that we have to do it ten days in
21 advance of the hearing. So we would publish it ten
22 business days in advance of February 27th.

23 THE HEARING OFFICER: So what would
24 be -- so let's -- will you look at your calendar and
25 count back ten business days? I don't know if there's

1 any holidays in there, but would you tell us what day
2 that this needs to be published on?

3 MR. RANKIN: I think it would need to
4 be published by February 13th.

5 THE HEARING OFFICER: So it'd be
6 safe -- we'll say the 12th.

7 MR. RANKIN: Yeah.

8 THE HEARING OFFICER: Okay. So you'll
9 have an affidavit from the newspaper showing that, and
10 we'll leave the record open then for that evidence of
11 correct notice by publication. Is there anything
12 else, Mr. Rankin?

13 MR. RANKIN: Mr. Examiner, that is
14 everything. We appreciate the Division's attention to
15 this case. Oxy's excited about it, and we look
16 forward to getting an order and then being able to
17 report back on the results.

18 THE HEARING OFFICER: Okay. Wonderful.
19 Then we are in recess in this case.

20 Mr. Rankin, you'll continue the case to
21 the February 27th docket. I think we'll make it --

22 Freya, the February 27th docket is a
23 status conference docket, isn't it?

24 MS. TSCHANTZ: It is. And it's a
25 virtual only docket.

1 THE HEARING OFFICER: Is that because
2 of the commission's hearing?

3 MS. TSCHANTZ: Correct.

4 THE HEARING OFFICER: Perfect. So why
5 don't we put this -- can we make -- once you continue
6 this, we'll put this at the top of our docket because
7 I know you have other things going on that week.
8 We'll just get the record open for the evidence, then
9 we'll take it under advisement at that time.

10 MR. RANKIN: Thank you. I believe
11 Ms. Vance will handle that for me because I'll be --

12 THE HEARING OFFICER: Of course.

13 MR. RANKIN: -- in the middle of the
14 commission hearing. So thank you.

15 THE HEARING OFFICER: Okay. Thank you
16 for -- thank you witnesses. Thank you, Mr. Harris,
17 Mr. Gebremichael, Mr. Cogswell. And we are off the
18 record.

19 (Whereupon, at 9:18 a.m., the
20 proceeding was concluded.)

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CERTIFICATE

I, JAMES COGSWELL, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action. February 18, 2025



JAMES COGSWELL
Notary Public in and for the
State of New Mexico

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CERTIFICATE OF TRANSCRIBER

I, DEANNA ANDERSON, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

February 18, 2025



DEANNA ANDERSON

[& - aware]

&	28th 20:24	access 16:17	affirmed 3:6,9
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New Mexico Rules of Civil Procedure for the
District Courts

Article 5, Rule 1-030

(e) Review by Witness; Changes; Signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have thirty (30) days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by Subparagraph (1) of Paragraph F of this rule whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES
ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.
THE ABOVE RULES ARE CURRENT AS OF APRIL 1,
2019. PLEASE REFER TO THE APPLICABLE STATE RULES
OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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