

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

**AMENDED APPLICATION OF OIL CONSERVATION
DIVISION TO ADOPT 19.15.41, 19.15.42, and
19.15.43 NMAC; STATEWIDE**

CASE NO. 25875

OXY'S REBUTTAL TESTIMONY AND EXHIBITS

Pursuant to 19.15.3.11.B NMAC and the Prehearing Procedural Order issued in this matter on June 8, 2026, OXY USA Inc. ("Oxy") hereby files its Rebuttal Testimony and Exhibits in this matter with the following information:

I. IDENTIFICATION OF PARTY AND COUNSEL

Oxy has intervened in this matter and is represented by undersigned counsel.

II. OXY'S WITNESS

Oxy intends to present the rebuttal technical testimony of the following witness at the hearing:

1. Caroline Wachtman - Oxy

Ms. Wachtman is a licensed Professional Geologist. She holds a bachelor's degree of science in Geology from the College of William & Mary and a master's degree of science in Geology from the University of Wisconsin-Madison. Her current duties include managing CO2 storage projects in Texas. Ms. Wachtman's written rebuttal testimony will address Oxy's concerns with the other parties' modifications to the proposed rules.

Her qualifications and relevant experience are further detailed in her testimony and resume. Oxy anticipates presenting a 30-minute summary of Ms. Wachtman's testimony. Ms. Wachtman is available for cross-examination following the submission of her rebuttal testimony. Oxy reserves the right to call Ms. Wachtman for surrebuttal testimony as necessary.

III. OXY'S PROPOSED MODIFICATIONS

Oxy's proposed modifications to the proposed rules are provided in Oxy Exhibit 1A–1C.

IV. OXY'S HEARING EXHIBITS

Oxy has provided with this Rebuttal the following exhibits for admittance at the hearing:

Oxy Exhibit 3, Rebuttal Testimony of Caroline Wachtman.

Oxy Exhibit 4, Resume of Caroline Wachtman.

V. PROCEDURAL MATTERS

Oxy has not identified any procedural matters to be resolved prior to the hearing.

Respectfully submitted,

HOLLAND & HART, LLP

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CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2026, I served a copy of the foregoing document to the following via Electronic Mail to:

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