

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

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

No. 25875

**OIL CONSERVATION DIVISION'S
NOTICE OF INTENT TO PRESENT REBUTTAL TESTIMONY**

Pursuant the *Pre-Hearing Order* issued in this matter, the Oil Conservation Division (“OCD”) files their Notice of Intent to Present Rebuttal Testimony. As required by Paragraph No. 4 of the *Pre-Hearing Order*, OCD provides the following information:

1. Identify the person for whom the witnesses will testify:

Mr. Justin Wrinkle, Dr. Gregory Schnaar, Dr. Hassan Khaniani, Dr. Sai Wang and Mr. Matt Eales with testify on behalf of OCD.

2. Identify each technical witness the person intends to present, and state the qualification of that witness, including a description of their educational and work background:

OCD intends to present the witnesses listed above who’s educational and work background are set forth in their resumes, previously filed on June 29, 2026, as **OCD Exhibits 5, 7, 9, 11, and 13.**

3. Include a copy of the rebuttal testimony of each technical witness in narrative form, and state the estimated duration of the rebuttal oral testimony of that witness:

A copy of the written rebuttal testimony of OCD’s witness Mr. Justin Wrinkle, Dr. Gregory Schnaar, Dr. Hassan Khaniani, Dr. Sai Wang and Mr. Matt Eales, is attached hereto as **OCD Exhibits 21-25.**

In accordance with the time limitations set forth in Paragraph No. 12 of the *Pre-Hearing Order*, summarized oral presentation of the rebuttal technical testimony will not exceed 30 minutes, unless authorized by the Hearing Officer.

4. List and attach all exhibits anticipated to be offered by that person at the hearing:

The exhibits OCD intends to submit in support of the technical rebuttal testimony are listed below. OCD reserves the right to call any person to testify and to offer any exhibit in response to any testimony, exhibit, or public comment presented in the public hearing.

Reference	Exhibit Title
OCD Exhibit 21	Rebuttal Testimony of Justin Wrinkle
OCD Exhibit 22	Rebuttal Testimony of Dr. Gregory Schnaar
OCD Exhibit 23	Rebuttal Testimony of Dr. Hassan Khaniani
OCD Exhibit 24	Rebuttal Testimony of Dr. Sai Wang
OCD Exhibit 25	Rebuttal Testimony of Matt Eales
OCD Exhibit 26	U.S. EPA UIC Program Class VI Well Site Characterization Guidance
OCD Exhibit 27	U.S. EPA UIC Program Class VI Well AoR Evaluation and Corrective Action Guidance
OCD Exhibit 28	U.S. EPA UIC Program Class VI Well Testing and Monitoring Guidance
OCD Exhibit 29	U.S. EPA Key Principles in EPA's Underground Injection Control Program Class VI Rule Related to Transition of Class II Enhanced Oil or Gas Recovery Wells to Class VI

Respectfully submitted,



Jesse K. Tremaine

Legal Director

Energy, Minerals, and Natural
Resources Department, Oil
Conservation Division

1220 South St. Francis Drive
Santa Fe, New Mexico 87505

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2026, a copy of the foregoing was served via electronic mail to the following parties:

Sheila Apodaca
occ.hearings@emnrd.nm.gov
Sheila.apodaca@emnrd.nm.gov
Oil Conservation Commission Clerk

Adam Rankin
Paula Vance
A. Raylee Starnes
Aaron B. Tucker
Agrankin@hollandhart.com
pmvance@hollandhart.com
arstarnes@hollandhart.com
abtucker@hollandhart.com
Counsel for Oxy USA, Inc

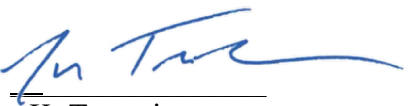
Ana Maria Gutierrez
Jessica Portmess
Amanda Thatcher
Ana.gutierrez@wbd-us.com
Jessica.portmess@wbd-us.com
Amanda.thatcher@wbd-us.com
Counsel for NMOGA

Zachary Shandler
zshandler@nm DOJ.gov
OCC Counsel

Morgan O'Grady
Rose Rushing
Daniel Timmons
ogrady@westernlaw.org
rushing@westernlaw.org
timmons@westernlaw.org
*Counsel for Diné C.A.R.E., Earthworks,
San Juan Citizens Alliance, Sierra Club Rio
Grande Chapter, Tó Nizhóní Ání, and
Western Environmental Law Center*

Zachary Pavlik
Colin Cox
zpavlik@biologicaldiversity.org
ccox@biologicaldiversity.org
*Counsel for the Center for Biological
Diversity*

Samantha Ruscavage-Barz
sruscavagebarz@wildearthguardians.org
Counsel for WildEarth Guardians

By: 
Jesse K. Tremaine