

OCD
Exhibit 21

STATE OF NEW MEXICO
NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF OIL CONSERVATION DIVISION
TO ADOPT 19.15.41, 19.15.42, AND 19.15.43 NMAC

No. 25875

REBUTTAL TESTIMONY OF JUSTIN WRINKLE
ON BEHALF OF THE OIL CONSERVATION DIVISION

JULY 13, 2026

Q. DID YOU PROVIDE DIRECT WRITTEN TESTIMONY IN THIS MATTER AND HAVE YOU PROVIDED A COPY OF YOUR RESUME/CV AS AN EXHIBIT?

A. Yes, my direct written testimony was submitted as OCD Exhibit 4 and my resume summarizing my qualifications and experience was provided as OCD Exhibit 5.

Q. HAVE YOU REVIEWED THE DIRECT WRITTEN TESTIMONY AND ASSOCIATED EXHIBITS SUBMITTED BY OXY USA INC (“OXY”) IN PREPARATION OF YOUR REBUTTAL TESTIMONY?

A. Yes.

Q. OXY PROPOSES TO ADD AN APPEAL PROVISION TO THE PROCEDURES FOR DECISION MAKING IN THE PROPOSED CLASS VI RULES.¹ WHAT IS YOUR RESPONSE?

A. Based on my experience with the Division's permitting program, an appeals process is already incorporated into the Division's regulatory framework, which would be applicable to the proposed Class VI program.² This process provides an opportunity for interested persons to seek administrative review of permit decisions.³ As a result, I do not believe the proposed revision by Oxy would materially change or improve the proposed Class VI rules.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

¹ Oxy Exhibit 1-A at 7; Oxy Exhibit 3 at 5-6

² See 19.15.4.8 NMAC

³ *Id.*