

OCD Exhibit 24

**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 DR. SAI WANG
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 10 and my resume summarizing my qualifications and experience was provided as OCD Exhibit 11.

Q. HAVE YOU REVIEWED THE DIRECT WRITTEN TESTIMONY AND ASSOCIATED EXHIBITS FOR DINE C.A.R.E., EARTHWORKS, SAN JUAN CITIZENS ALLIANCE, SIERRA CLUB RIO GRANDE CHAPTER, TO NIZHONI ANI AND WESTERN ENVIRONMENTAL LAW CENTER'S (COLLECTIVELY CONSERVATION GROUPS) TO PREPARE THIS WRITTEN REBUTTAL TESTIMONY?

A. Yes.

Q. THE CONSERVATION GROUPS PROPOSE ADDITIONS TO THE TESTING AND MONITORING REQUIREMENTS WITH INCLUSION OF SITE-SPECIFIC DATA TO THE PRESSURE FALL-OFF TEST.¹ WHAT IS YOUR RESPONSE?

A. The proposed language by the Conservation Groups appears to prescribe implementation details that are already addressed through the project-specific Testing and Monitoring Plan.² In my opinion, the language currently contained in 40 C.F.R. § 146.90(f) and OCD's proposed rule is sufficient to establish the operational requirement for conducting testing and monitoring during Class VI injection operations.³ Retaining the existing proposed regulatory language while relying on the project-specific Testing and Monitoring Plan

¹ Conservation Group Exhibit 1-C at 043

² OCD Exhibit 3 at 19.15.43.9.K

³ *Id.*

provides sufficient flexibility to address site-specific operational conditions without imposing additional statewide requirements that may be unnecessary or redundant.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.