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

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IN THE MATTER OF PROPOSED
AMENDMENT TO THE COMMISSION'S
RULES TO ADDRESS CHEMICAL DISCLOSURE AND
THE USE OF PERFLUOROALKYL AND
POLYFLUOROALKYL SUBSTANCES AND
IN OIL AND GAS EXTRACTION,
19.15.2, 19.15.7, 19.15.14, 19.15.16, AND 19.15.25 NMAC   **Case No. 23580**

WILDEARTH GUARDIANS,

    PETITIONER.

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<u>NEW MEXICO OIL & GAS ASSOCIATION'S NOTICE OF INTENT TO PRESENT</u>
<u>TECHNICAL REBUTTAL TESTIMONY OF DR. STEPHEN RICHARDSON</u>

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Although the June 3, 2024, Amended Procedural Order does not expressly require a notice of intent to provide rebuttal testimony, in an abundance of caution, the New Mexico Oil & Gas Association ("NMOGA") submits this Notice of Rebuttal Testimony pursuant to 19.15.3.11(B) NMAC.

I.   **SUMMARY OF REBUTTAL**

Stephen Richardson ("Dr. Richardson") is a Principal Engineer and Vice President at GSI Environmental and has twenty-two years of combined academic and consulting experience. His technical background and work experience is reflected in NMOGA Exhibit D. Dr. Richardson will provide rebuttal testimony to or on WildEarth Guardians (WEG), New Energy Economy (NEE), and the Oil Conservation Division's (OCD) proposed amendments, and will discuss, analyze, and elaborate on each of the proposed amendments; offer fact and other expert opinions supporting NMOGA's proposed modifications to WEG, NEE, and OCD's amendments needed for rebuttal, which includes, but is not limited to, rebuttal to direct and rebuttal testimonies from Drs. Hansen,

Brown, Spear, Martin, and Sandau, as appropriate; address, and rebut any additional issues that may arise as a hearing in this matter progresses.

II. PROPOSED EVIDENCE

WITNESS:

1. Dr. Stephen Richardson, PhD, PE, PEng

REBUTTAL EXHIBITS:

Rebuttal Exhibits may be introduced and offered for admission. If Rebuttal Exhibits will be used, copies of any such Exhibits will be provided to all persons listed on the Certificate of Service below.

III. PROCEDURAL MATTERS

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

Respectfully submitted,

HOLLAND & HART LLP

By:_____

Michael H. Feldewert
Adam G. Rankin
Cristina A. Mulcahy
Paula M. Vance
Julia Broggi
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
camulcahy@hollandhart.com
pmvance@hollandhart.com
jbroggi@hollandhart.com

ATTORNEYS FOR THE NEW MEXICO OIL & GAS ASSOCIATION

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of Intent to Present Rebuttal Testimony of Dr. Stephen Richardson was e-mailed to the following on November 13, 2024:

NM Oil Conservation Commission Hearings:
occ.hearings@emnrd.nm.gov

Oil Conservation Commission Clerk Sheila Apodaca:
Sheila.Apodaca@emnrd.nm.gov

Jesse Tremaine
Chris Moander
Assistant General Counsel
New Mexico Energy Minerals and
Natural Resources Department
1220 S. St. Francis Drive
Santa Fe, NM 87505
jessek.tremaine@emnrd.nm.gov
chris.moander@emnrd.nm.gov

Attorneys for New Mexico Oil Conservation Division

Daniel Rubin
Assistant Attorney General
NM Dept. of Justice
408 Galisteo St.
Santa Fe, NM 87501
505-537-4477
drubin@nmag.gov

Attorney for New Mexico Oil Conservation Commission

Tim Davis
Tim Davis
WildEarth Guardians
301 N. Guadalupe St., Ste. 201
Santa Fe, NM 87501
(205) 913-6425
tdavis@wildearthguardians.org

Attorney for WildEarth Guardians

Deana M. Bennett
Modrall Sperling
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
deana.bennett@modrall.com

Jordan L. Kessler
125 Lincoln Avenue, Suite 213 Santa Fe, New Mexico 87501
(432) 488-6108
jordan_kessler@eogresources.com

Attorneys for EOG Resources, Inc.

Mariel Nanasi, Esq.
Executive Director
New Energy Economy
300 East Marcy St.
Santa Fe, NM 87501
(505) 469-4060
mariel@seedsbeneaththesnow.com

Attorney for New Energy Economy

Mr. Nicholas R. Maxwell
P.O. Box 1064
Hobbs, New Mexico 88241
Telephone: (575) 441-3560
inspector@sunshineaudit.com

Individually

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