

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

**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.

**NEW MEXICO OIL & GAS ASSOCIATION'S NOTICE OF INTENT TO PRESENT
TECHNICAL REBUTTAL TESTIMONY OF DR. JANET ANDERSON**

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

Janet Anderson ("Dr. Anderson") is a Principal Toxicologist and Vice President at GSI Environmental, with fifteen (15) years of experience in toxicology, risk assessment, and risk management. She is a recognized leader in unregulated and emerging chemicals, such as PFAS; 1,4 dioxane; and 1,2,3, trichloropropane. Her technical background and work experience is reflected in NMOGA Exhibit E. Dr. Anderson 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. Janet Anderson, PhD, DABT

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,

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**ATTORNEYS FOR THE NEW MEXICO OIL & GAS
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CERTIFICATE OF SERVICE

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

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Individually