

**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; STATEWIDE**

CASE NO. 25875

OIL CONSERVATION DIVISION'S PRE-HEARING STATEMENT

Pursuant to 19.15.3.11.B(2) NMAC and the Pre-Hearing Order issued in this matter, the Oil Conservation Division ("OCD") files their Pre-Hearing Statement. As required by applicable regulations and the Pre-Hearing Order, OCD provides the following information:

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

The witnesses identified below, Mr. Justin Wrinkle, Dr. Gregory Schnaar, Dr. Hassan Khaniani, Dr. Sai Wang, Mr. Matt Eales, and Ms. Jennifer Raney will testify on behalf of the 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 below who's educational and work background are set forth in their resumes, attached as **OCD Exhibits 5, 7, 9, 11, 13, and 15**.

Mr. Wrinkle is currently the Engineering Bureau Chief of the OCD, where he oversees and manages the Engineering Bureau which includes the Underground Injection Control program and the Administrative Permitting Program.

Dr. Schnaar specializes in carbon capture and storage (CCS) and groundwater investigations. As a fellow at the U.S. EPA, he was a key member of the regulatory development team for the Underground Injection Control (UIC) Class VI rulemaking, and as a consultant he supported U.S. EPA in development of technical guidance documents that support the rulemaking. Dr. Schnaar received his Ph.D. in Soil, Water, and Environmental Science from the University of Arizona, and a B.S. in Environmental Science and Policy from the University of Maryland.

Dr. Khaniani focuses on subsurface modeling, seismic imaging, and reservoir characterization and also serves as an Assistant Professor at the New Mexico Institute of Mining and Technology. Dr. Khaniani received his Ph.D. in Geophysics from the University of Calgary, his M.S. in Petroleum Engineering from the University of Calgary, and his B.S. in Petroleum Engineering from the Petroleum University of Technology-Iran.

Dr. Wang is currently employed by the New Mexico Institute of Mining and Technology as an Assistant Professor in the Department of Petroleum and Natural Gas Engineering, a

Section Head/Research Engineer in the Petroleum Recovery Research Center, and a Dean's Developing Scholar. His expertise includes well design/drilling/completion, field operation and production, flow assurance, carbon sequestration and mineralization, geo-energy exploration (hydrogen, geothermal and critical minerals/REE), methane emission mitigation, enhanced oil recovery, conventional/unconventional reservoir management, regulation and permit, fluid flow in porous media, analytical chemistry and geochemistry. Dr. Wang received his Ph.D. in Petroleum Engineering from the University of North Dakota, a M.S. in Petroleum Engineering from New Mexico Institute of Mining and Technology, and a B.S. in Applied Chemistry from Hainan University.

Mr. Eales is currently the CEO and President of CoolSky Energy Solution, which has a focus on carbon capture through permitting, drilling, operation, and compliance assistance. Mr. Eales received his M.S. in Environmental Engineering from the University of Kansas, and his B.S. in Environmental Studies from the University of Kansas.

Ms. Raney is currently the Deputy Director of the Petroleum Recovery Research Center at New Mexico Institute of Mining and Technology where she oversees numerous research projects and associated staff and funding. Ms. Raney received her M.S. in Environmental Science from the University of Kansas and her B.S. in Environmental Science from Tulane University.

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

Attached is the full written direct testimony of Mr. Justin Wrinkle, Dr. Gregory Schnaar, Dr. Hassan Khaniani, Dr. Sai Wang, Mr. Matt Eales, and Ms. Jennifer Raney attached as **OCD Exhibits 4, 6, 8, 10, 12, and 14**. The witnesses' oral direct testimony at hearing is anticipated not to exceed 60 minutes.

4. Include the text of any recommended modifications to the proposed regulatory change:

OCD's proposed regulatory change modifications are attached as **OCD Exhibits 1, 2, and 3**.

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

OCD will offer the below exhibits:

Reference	Exhibit Title
OCD Exhibit 1	19.15.41 NMAC – Proposed Changes to OCD Amended Exhibit 2A
OCD Exhibit 2	19.15.42 NMAC – Proposed Changes to OCD Amended Exhibit 2B

OCD Exhibit 3	19.15.43 NMAC – Proposed Changes to OCD Amended Exhibit 2C
OCD Exhibit 4	Direct Written Testimony of Justin Wrinkle
OCD Exhibit 5	Justin Wrinkle Resume
OCD Exhibit 6	Direct Written Testimony of Gregory Schnaar
OCD Exhibit 7	Gregory Schnaar Resume
OCD Exhibit 8	Direct Written Testimony of Hassan Khaniani
OCD Exhibit 9	Hassan Khaniani Resume
OCD Exhibit 10	Direct Written Testimony of Sai Wang
OCD Exhibit 11	Sai Wang Resume
OCD Exhibit 12	Direct Written Testimony of Matt Eales
OCD Exhibit 13	Matt Eales Resume
OCD Exhibit 14	Direct Written Testimony of Jennifer Raney
OCD Exhibit 15	Jennifer Raney Resume
OCD Exhibit 16	EPA UIC Program Class VI Implementation Manual for UIC Program Directors
OCD Exhibit 17	Class VI Review Flowchart
OCD Exhibit 18	EPA Guidelines on Community Engagement for Geologic Sequestration Project Developers and Class VI Permit Applicants
OCD Exhibit 19	World Research Institute Community Engagement Guidelines
OCD Exhibit 20	Interstate Oil and Gas Compact Commission Model Statute

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 June 29, 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

Zachary Shandler
zshandler@nm DOJ.gov
OCC Counsel

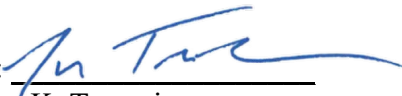
Adam Rankin
Paula Vance
A. Raylee Starnes
Agrankin@hollandhart.com
pmvance@hollandhart.com
arstarnes@hollandhart.com
Counsel for Oxy USA, Inc

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

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
zpavlik@biologicaldiversity.org
*Counsel for the Center for Biological
Diversity*

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

By: 

Jesse K. Tremaine