

STATE OF NEW MEXICO
BEFORE THE ENVIRONMENTAL IMPROVEMENT BOARD

IN THE MATTER OF THE PETITION FOR)
HEARING TO ADOPT NEW REGULATIONS)
AND TO AMEND VARIOUS SECTIONS OF)
20.2.1, 20.2.2, 20.2.70, and 20.2.72 NMAC,)
Statewide Cap on Greenhouse Gas Emissions)
_____)

No. EIB 08-19(R)

PETITIONER'S NOTICE OF INTENT TO PRESENT TECHNICAL TESTIMONY

COMES NOW, New Energy Economy, Inc. ("Petitioner"), by and through its attorneys New Mexico Environmental Law Center, and pursuant to the Hearing Examiner's Second Order for Hearing Procedures and NMAC § 20.1.1.302(A), submit this Notice of Intent to Provide Technical Testimony.

1. Identity of the person for whom the witnesses will testify.

Petitioner.

2. Identity of each technical witness Petitioner intends to present and their qualifications, including a description of their educational and work background.

A. Dr. David S. Gutzler. Dr. Gutzler's qualifications are described in his attached testimony. (See Tab A.)

B. Dr. Paul R. Epstein, M.D., M.P.H. Dr. Epstein's qualifications are described in his attached testimony. (See Tab B.)

C. Mr. Steven S. Michel. Mr. Michel's qualifications are described in his attached testimony. (See Tab C.)

D. Mr. Matthew F. Pawa. Mr. Pawa's qualifications are described in his attached testimony. (See Tab D.)

3. Description of direct testimony of each technical witness and anticipated duration of their testimony.

Pursuant to the Hearing Examiner's Second Order for Hearing Procedures, each witness's pre-filed direct testimony is attached hereto, and each witness shall present a summary of the major points of their testimony at hearing. The summary is anticipated to require no more than two (2) hours per witness.

4. Text of recommended modifications to the proposed regulatory change.

A text of Petitioner's recommended modifications to the proposed regulations is attached as an exhibit to Mr. Michel's pre-filed direct testimony. (Petitioner's Tab C, Exhibit 12.)

5. Petitioner's exhibits and proposed statement of reasons for adoption of rules.

A. Petitioner's Exhibits are attached hereto under Tabs A through E.

B. Petitioner proposes the following statement of reasons:

1) The global climate in general and New Mexico's climate in particular is now warmer than at any time during the past century.

2) There is powerful evidence that much of the warming observed in recent decades is the result of a stronger greenhouse effect caused by anthropogenic emissions of greenhouse gases ("GHGs").

3) Given a plausible range of greenhouse gas increases in the 21st century, the climate change models project a global rise in annual temperature of 3°F to 7°F. This could correspond to an increase in temperature across the state of New Mexico of more than 5°F in winter and almost 8°F in summer by the end of the century.

4) The temperature changes cited above will have significant effects on many aspects of life in New Mexico. Projected 21st-century climate change is likely to diminish the water supply to the entire western half of the United States.

5) If the current warming trend continues, it will severely reduce snowpack across western North America.

6) Climate model results shown in the report from the state engineer's office (Exhibit 3) indicate that there may be no snowpack at all south of Santa Fe by the end of this century.

7) A warmer climate in the 21st century means that future droughts will have more severe impacts. Warmer temperatures, more extreme and more frequent heat waves, and a drier surface will make drought episodes more extreme in the changed climate.

8) Paradoxically, increased evaporation and warmer surface temperatures also mean that the potential for very intense precipitation events increases.

9) One of the general expectations for a warmer climate, borne out by recent observed trends and by model projections of future climate, is for more variability and more extreme conditions—both severe droughts and more frequent severe weather and flooding (even in the midst of long-term drought).

10) The changes in climate projected for the 21st century will cause an overall decrease in flow in all of New Mexico's major snow-fed rivers (including the Rio Grande, Pecos, Canadian, Gila, and San Juan Rivers).

11) Calculations indicate that a 2°C change in average seasonal air temperatures could plausibly cause an elevational range shift of approximately 269 m to 286 m

for the Gila Trout, which would represent a 70% loss in suitable habitat for existing trout streams in July based on changes in elevation.

12) A decrease in suitable Gila trout habitat as a result of the projected scenario would lead to further declines in populations and increased risk to environmental and demographic stochastic events. For example, decreased precipitation and a longer warmer season would increase the fire potential, both in frequency or severity.

13) Lower GHG emissions will result in a reduced rate of increase in global concentrations, which would reduce the magnitude and rate of change of climate. Climate change will occur faster for higher greenhouse gas emissions rates.

14) Plausible climate change scenarios will likely result in increased volumes of dust swept vast distances, more photochemical smog and higher concentrations of CO₂-linked aeroallergens (pollen and mold), driving up rates of asthma. This would cause perceptible impairment of public health as a result of these ills, whether measured by morbidity and mortality, disability adjusted life years lost, or by the incremental medical resources devoted to the emerging problems and the associated rise in insurance costs.

15) There is a real possibility of sudden and catastrophic impacts on health, ecosystems and economies under a gradual warming scenario, resulting in widespread epidemics, explosive crop and forest infestations, and coral reef collapse could severely damage the social fabric.

16) Increased drought brought on by climate change will plausibly increase the incidence of occurrence of certain viral outbreaks, such as West Nile Virus and St. Louis encephalitis.

17) Without substantial and near-term efforts to significantly reduce emissions, atmospheric levels of greenhouse gases will continue to climb, and thus lead to ever greater rates of climate change. Future warming over the course of the 21st century, even under scenarios of low emissions growth, is very likely to be greater than observed warming over the past century.

18) Human-induced climate change has the potential to be far-reaching and multi-dimensional.

19) The elevated atmospheric concentrations of GHGs, particularly carbon dioxide (CO₂) and methane (CH₄), may reasonably be anticipated to endanger the public health and welfare of current and future generations. The climate change associated with elevated atmospheric concentrations of carbon dioxide and the other GHGs have the potential to affect essentially every aspect of human health, society and the natural environment. Climate change can increase the risk of morbidity and mortality.

20) The warming is projected to increase heat related mortality and morbidity, especially among the elderly, young and frail. The populations most sensitive to hot temperatures are older adults, the chronically sick, the very young, city-dwellers, those taking medications that disrupt thermoregulation, the mentally ill, those lacking access to air conditioning, those working or playing outdoors, and socially isolated persons. As warming increases over time, these adverse effects would be expected to increase as the serious heat events become more serious, and increases in heat-related mortality due to global warming in the United States are unlikely to be compensated for by decreases in cold-related mortality.

21) Climate change is expected to increase regional ozone pollution, with associated risks in respiratory illnesses and premature death. In addition to human health effects,

tropospheric ozone has significant adverse effects on crop yields, pasture and forest growth, and species composition. There is consistent evidence from models and observations that 21st century climate change will worsen summertime surface ozone in polluted regions of North America compared to a future with no climate change.

22) Human-induced climate change may alter extreme weather events, increasing the risk of serious adverse impacts such as hurricanes and floods.

23) There is some evidence that elevated carbon dioxide concentrations and climate changes can lead to changes in aeroallergens that could increase the potential for allergenic illnesses.

24) Certain groups, including children, the elderly, and the poor, are most vulnerable to adverse climate-related health effects.

25) GHG emissions may reasonably be anticipated to endanger public welfare, both for current and future generations.

26) Food production and agriculture within the United States is a sector that will be affected by the combined effects of elevated carbon dioxide concentrations and associated climate change.

27) Elevated carbon dioxide concentrations can have a stimulatory effect on grain and oilseed crop yield, as may modest temperature increases and a longer growing season. However, such beneficial influences must be considered in light of various other effects. For example, elevated carbon dioxide concentrations may also enhance pest and weed growth. Pests and weeds can reduce crop yields, cause economic losses to farmers, and require management control options. How climate change (elevated carbon dioxide, increased temperatures, altered precipitation patterns, and changes in the frequency and intensity of extreme events) may affect

the prevalence of pests and weeds is an issue of concern for food production and the agricultural sector.

28) With respect to livestock, higher temperatures will very likely reduce livestock production during the summer season in some areas, but these losses will very likely be partially offset by warmer temperatures during the winter season. However, the adverse impact on livestock productivity due to increased variability in weather patterns will likely be far greater than effects associated with the average change in climatic conditions.

29) Cold-water fisheries will likely be negatively affected by climate change.

30) With respect to irrigation requirements, the adverse impacts of climate change on irrigation water requirements may be significant.

31) The available evidence generally points towards increasing risk of net adverse impacts from climate change on U.S. food production and agriculture, with the potential for significant disruptions and crop failure in the future.

32) Climate change has very likely increased the size and number of wildfires, insect outbreaks, and tree mortality in the Interior West, the Southwest, and Alaska, and will continue to do so. Rising atmospheric carbon dioxide levels will very likely increase photosynthesis for forests, but the increased photosynthesis will likely only increase wood production in young forests on fertile soils.

33) Precipitation and weather extremes are key to many forestry impacts, accounting for part of the regional variability in forest response. If existing trends in precipitation continue, it is expected that forest productivity will likely decrease in the Interior West, the Southwest, eastern portions of the Southeast. An increase in drought events will very likely reduce forest productivity wherever such events occur.

34) The sensitivity of water resources to climate change is very important given the increasing demand for adequate water supplies and services for agricultural, municipal, and energy and industrial uses, and the current strains on this resource in many parts of the country.

35) Climate change is causing and will increasingly cause shrinking snowpack induced by increasing temperature. In the western United States, there is already well-documented evidence of shrinking snowpack due to warming. Earlier meltings, with increased runoff in the winter and early spring, increase flood concerns and also result in substantially decreased summer flows. This pattern of reduced snowpack and changes to the flow regime pose very serious risks populations that rely on snowmelt-dominated watersheds for their water supply, like New Mexico.

36) Warmer temperatures and decreasing precipitation in the Southwest can sustain and amplify drought impacts.

37) Efforts to offset declining surface water availability due to increasing precipitation variability may be hampered by the fact that groundwater recharge will decrease considerably in some already water-stressed regions.

38) Climate change is expected to have adverse effects on water quality. The Intergovernmental Panel on Climate Change (IPCC) concluded with high confidence that higher water temperatures, increased precipitation intensity, and longer periods of low flows exacerbate many forms of water pollution and can impact ecosystems, human health, and water system reliability and operating costs. Water pollutants of concern that are particularly relevant to climate change effects include sediment, nutrients, organic matter, pathogens, pesticides, salt, and thermal pollution. As waters become warmer, the aquatic life they now support will be

replaced by other species better adapted to warmer water. In the long term, warmer water, changing flows, and decreased water quality may result in deterioration of aquatic ecosystems.

39) Reliance on past conditions as the basis for current and future planning may no longer be appropriate, as climate change increasingly creates conditions well outside of historical observations. Increased incidence of extreme weather and floods may also overwhelm or damage water treatment and management systems, resulting in water quality impairments.

40) The total scientific literature provides compelling support for finding that greenhouse gas air pollution endangers the water resources important for public welfare in the United States, both for current and future generations. The adequacy of water supplies across large areas of the country is at serious risk from climate change.

41) Climate change is expected to call for an increase in electricity production, especially supply for peak demand.

42) Within settlements experiencing climate change stressors, certain parts of the population may be especially vulnerable based on their circumstances. These include the poor, the elderly, the very young, those already in poor health, the disabled, those living alone, and/or indigenous populations dependent on one or a few resources.

43) Overall, the evidence strongly supports the view that climate change presents risks of serious adverse impacts on public welfare from the risk to energy production and distribution as well as risks to infrastructure and settlements.

44) The total scientific record provides compelling support for finding that the greenhouse gas air pollution leads to predominantly negative consequences for biodiversity and the provisioning of ecosystem goods and services for ecosystems and wildlife. The severity of

risks and impacts may only increase over time with accumulating greenhouse gas concentrations and associated temperature increases and precipitation changes.

45) Over the 21st century, changes in climate will cause some species to shift north and to higher elevations and fundamentally rearrange U.S. ecosystems.

46) Global warming is shrinking cold-water habitat, threatening the survival of trout and a million dollar recreational fishing industry.

47) Petitioner's proposed regulations are restricted to the electricity generation and oil and gas sectors and will have a minimal economic impact on these sectors. On the other hand, Petitioner's proposed regulations will help create a market for offsets and encourage non-covered sectors to reduce their greenhouse gas emissions.

48) Although the electricity and oil and gas sectors are vital to New Mexico's economy, the "business-as-usual" scenario will potentially be devastating for New Mexico in terms of multiple adverse impacts to public health and welfare.

49) "On a per capita basis, New Mexico produces near twice the GHG emissions as the national average (45 vs. 25 tCO₂e per person). New Mexico's high per capita emissions are largely the result of its GHG-intensive gas, oil, and electricity production industries." Climate Change Advisory Group, Final Report at 2-2 (December 2006).

50) "Emissions of greenhouse gases by electric power plants, the State's leading emission source, are relatively well understood, and are for the most part (carbon dioxide at facilities over 25 MW) continuously monitored. Over 90% of these emissions occur at the State's coal-fired facilities, and two plants, San Juan and Four Corners, account for about three-quarters. Natural gas-fired power plants produce the remaining emissions from this sector." Id. at 2-3.

51) “Emissions of carbon dioxide and methane occur at many stages of the fossil fuel production and delivery process (drilling, production, processing/refining, and pipeline transport), and can be highly dependent upon local resource characteristics (e.g., pressure, depth, water content, gas concentrations), technologies applied, and practices employed at individual wells sites and compressor stations.” *Id.* With over 40,000 oil and gas wells, three oil refineries, several gas processing plants, and tens of thousands of miles of gas pipelines in the State – and no regulatory requirements to track CO₂ or CH₄ emissions – there are significant uncertainties with respect to the State’s GHG emissions from this sector. Preliminary estimates however, suggest that fossil fuel industry emissions are quite high. The majority of emissions come from natural gas production, with significant emissions resulting from fuel use at field sites, processing plants, and pipelines (6 MMtCO₂e), the release of associated CO₂ found in the coalbed methane from the Fruitland field in the San Juan Basin (5 MMtCO₂e), and methane vented and flashed at well sites, processing plants, and pipelines (5 MMtCO₂e).” *Id.*

52) Together, the fossil fuel and electricity generating industries generate nearly 65% of New Mexico’s GHG emissions. *Id.* (Figure 2-2).

53) “A 10,000 metric ton of [CO₂e] per year threshold approximately doubles the number of facilities affected compared to a 25,000 metric ton threshold. The effect of a 10,000 metric ton threshold would only improve national emissions coverage by approximately 1 percent. The extra data that would result from a 10,000 metric ton threshold would do little to further the objectives of the [GHG monitoring] program. EPA believes the 25,000 metric ton threshold more effectively targets large industrial emitters, which are responsible for some 90 percent of U.S. emissions. Similarly, California’s mandatory GHG reporting program also based

their selection of a 25,000 metric ton threshold on similar results at the State level.” Mandatory Reporting of Greenhouse Gases, 74 FR 16448. 16468 (Proposed Rule—April 10, 2009).

54) EPA requires numerous sources that emit more than 25,000 tons per years of greenhouse gases, measured in terms of CO₂e, to report their GHG emissions to EPA. Mandatory Reporting of Greenhouse Gases, 74 FR 56260 (Final Rule—October 30, 2009). Where possible, the Board should act consistently with EPA and other states in regulating greenhouse gases.

55) In terms of tons per year, carbon dioxide and methane are by far the largest contributors to New Mexico’s statewide emissions of greenhouse gases from stationary sources.

56) The emission of carbon dioxide and methane at or above 25,000 metric tons per year from the GHG sources defined in regulations, measured in terms of CO₂e, contributes to global warming by increasing the concentration of these long-lived greenhouse gases in the atmosphere. As set out herein above, global warming harms public health and welfare in numerous ways and will increasingly harm public health and welfare in the future unless the emission of greenhouse gases are reduced.


57) The emission of carbon dioxide and methane at or above 25,000 metric tons per year from the GHG sources defined in regulations, measured in terms of CO₂e, constitutes “air pollution,” within the meaning of the Air Quality Control Act (“AQCA”), and also contributes to a nuisance within the meaning of the Environmental Improvement Act (“EIA”). Therefore, the Board has authority to adopt the regulations pursuant to the AQCA and the EIA.

58) Considering all of the evidence, it is in the public interest for New Mexico to begin reducing its emissions of greenhouse gases in order to proportionally reduce its contribution to global warming.

59) The regulations are technically practical and economically reasonable. They include a reasonable cost cap that limits their economic impact. The regulations also allow for offsets, credits, borrowing and banking. They provide multiple compliance mechanisms, thus allowing regulatory flexibility. At the same time, they will substantially reduce New Mexico's GHG emissions in accordance with sound science.

Respectfully submitted:

NEW MEXICO ENVIRONMENTAL LAW
CENTER


By: 

Bruce Frederick
Douglas Meiklejohn
Eric Jantz
1405 Luisa Street, Ste. 5
Santa Fe, NM 87505
(505) 989-9022
bfrederick@nmelc.org

Attorneys for Petitioner

Certificate of Service

I certify that the foregoing document was emailed on the 2nd day of March 2010 to the persons identified on the attached service list and that the original and appropriate number of copies was filed with EIB.


Bruce Frederick

SERVICE LIST

<p>Eric Ames, Asst. General Counsel Office of General Counsel NM Environment Department Runnels Bldg. Rm. N4050 1190 St. Francis Drive Santa Fe, New Mexico 87505</p> <p>eric.ames@state.nm.us</p> <p><i>Representing NMED</i></p>	<p>Eric Groten, Esq. Vinson & Elkins LLP 2801 Fortuna, Suite 100 Austin, Texas 78746</p> <p>egroten@velaw.com</p> <p><i>Representing EPEC</i></p>	<p>Timothy Van Valen, Esq. Mark Mathews, Esq. Bret Fox, Esq. Brownstein Hyatt Law Firm Albuquerque Plaza 201 Third Street, NW, Suite 1700 Albuquerque, NM 87102</p> <p>tvanvalen@bhsf.com</p> <p><i>Representing Grupo Cementos de Chihuahua</i></p>
<p>Stephen Vigil Asst. Atty. General NM AG P. O. Box 1508 Santa Fe, NM 87504</p> <p>svigil@nmag.gov</p> <p><i>Representing EIB</i></p>	<p>Louis Rose, Esq. Montgomery & Andrews P. O. Box 2307 Santa Fe, NM 87504</p> <p>lrose@montand.com</p> <p><i>Representing NMOGA</i></p>	<p>Steven Michel, Esq. Western Resource Advocates 227 East Palace Avenue Santa Fe, NM 87501 smichel@westernresources.org</p> <p><i>Representing Western Resource Advocates</i></p>
<p>Robb Thomson NM Conference of Churches 250 East Alameda, Apt. 15 Santa Fe, NM 87501-2177</p> <p>robbm@toast.net</p> <p><i>NM Conference of Churches</i></p>	<p>Richard Alvidrez, Esq. Miller Stratvert Law Firm P. O. Box 25687 Albuquerque, NM 87125 ralvidrez@mstlaw.com</p> <p><i>Representing PNM & SW PNM</i></p>	<p>Karin V. Foster, Esq. Chatham Partners, Inc. 5805 Mariola Place, NE Albuquerque, NM 87111 Fosterassociates2005@Yahoo.com</p> <p><i>Representing IPA of NM</i></p>
<p>Sunny Nixon, Esq. Rodey Law Firm P. O. Box 1357 Santa Fe, NM 87504</p> <p>snixon@rodey.com</p> <p><i>Representing the City of Farmington & Farmington Elec. Utlty. System</i></p>	<p>Cecilia Abeyta NM Farm and Livestock Bureau 1835 San Felipe Circle Santa Fe, NM 87505</p> <p>cecilia.abeyta@nmfarmbureau.org</p>	<p>Katherine Campbell NM League of Women Voters 2315 San Pedro, NE, Suite F6 Albuquerque, NM 87110</p> <p>ksmithcamp@cybermesa.com</p>

<p>Robert Bernstein, MD NM Physicians for Social Responsibility 1580 Cerro Gordo Santa Fe, NM 87501</p> <p>rbern007@cybermesa.com</p>	<p>Minda McGonagle National Federation of Independent Business P. O. Box 57178 Albuquerque, NM 87187</p> <p>Minda.McGonagle@NFIB.ORG</p>	<p>Arturo Sandoval Center of Southwest Culture, Inc. 500 Copper Ave., NW, Ste. 103 Albuquerque, NM 87102 vocesinc@aol.com</p>
<p>John A. Byrom, D.J. Simmons. Inc. 1009 Ridgeway Place. Suite 200 Farmington. NM 87401</p> <p>jbyrom@djsimmons.com</p>	<p>Larry R. Scott Lynx Petroleum Consultants, Inc. P.O. Box 1708 Hobbs, NM 88241</p> <p>lynxpet@leaco.net</p>	

<p>Phyllis Kaplan Center Advancing Sustainable Architecture 2532 Tramway Terrace Court NE Albuquerque, NM 87122</p> <p>p.kaplan@casa-center.org</p>	<p>Joanne M. Ray, D.O. NM Pediatric Society 2132 A Central Ave., SE, #289 Albuquerque, NM 87110</p> <p>nmpeds@yahoo.com</p>	<p>Michael Jensen Amigos Bravos P. O. Box 238 Taos, NM 87571</p> <p>mjensen@amigosbravos.org</p>
<p>Bianca Sopoci-Belknap Earthcare International 1235 Siler Road, Ste. D Santa Fe, NM 87507</p> <p>bianca@earthcare.org</p>	<p>Joan Brown NM Interfaith Power and Light 1004 Major Ave., NW Albuquerque, NM 87107</p> <p>joankansas@swcp.com</p>	<p>Kathy Sanchez Tewa Women United P. O. Box 397 Santa Cruz, NM 87567</p> <p>wanpovi@hotmail.com</p>
<p>Robby Rodriquez Southwest Organizing Project 211 10th Street SW Albuquerque, NM 87102</p> <p>marjorie@swop.net</p>	<p>Vickie Pozzebon Santa Fe Alliance P. O. Box 23864 Santa Fe, NM 87502</p> <p>vicki@santafealliance.com</p>	<p>Eddy County Board of Commissioners Attn. Allen R. Sartin, County Mgr. 101 West Greene St., Ste. 110 Carlsbad, NM 88220</p> <p>asartin@co.eddy.nm.us</p>

<p>Carlsbad Department of Development Attn. Steve McCutcheon, Pres., Bd. of Directors P. O. Box 1090 Carlsbad, NM 88221</p> <p>cdod@developcarlsbad.org</p>	<p>Tina Dziuk 11000 Spain NE, Bldg. B Albuquerque, NM 87111</p> <p>tdziuk@prusandia.com</p>	<p>James Mackenzie VAWTPower Management, Inc 47 Forest Lane Placitas, NM 87043</p> <p>jimimack@vawtpower.com</p>
<p>Robert G. Armstrong Armstrong Energy Corporation PO Box 1973 Roswell, New Mexico 88202</p> <p>rga@armstrongenergycorp.com</p>	<p>William Mayhew McKay Oil and Gas, LLC PO Box 14738 Albuquerque, NM 87191</p> <p>Bill@McKayOilandGas.com</p>	<p>Paul C. Thompson Thompson Engineering & Prod. Corp. 7415 East Main Street Farmington, NM 87402</p> <p>paul@walsheng.net</p>
<p>Ed Hasely Energen Resources, Incorporated 2010 Afton Place Farmington, New Mexico 87401</p> <p>ed.hasely@energen.com</p>	<p>Lisa Winn XTO Energy Inc. 810 Houston St. Fort Worth, TX 76102</p> <p>Lisa_Winn@xtoenergy.com</p>	<p>John D. Roe Dugan Production Corp. P. O. Box 420 Farmington, NM 87499-0420</p> <p>johnroe@duganproduction.com</p>
<p>Randy Poteet ConocoPhillips Company P. O. Box 4289 Farmington, NM 87499</p> <p>Randy.Poteet@conocophillips.com</p>	<p>Lawrence O. Hanna, Esq. Lea County Attorney P. O. Box 2733 Hobbs, NM 88241</p> <p>hannalaw@zianet.com</p>	<p>Elizabeth Gallaway, Esq. Mountain States Legal Foundation 2596 Lewis Way Lakewood, CO 80227</p> <p>egallaway@mountainstateslegal.com</p>
<p>Joel M. Carson III, Esq. 400 N. Pennsylvania, Suite 290 Roswell, NM 88201</p> <p>jcarson@mackenergycorp.com</p> <p>Attorney for Mack Energy Corporation</p>	<p>Mike McVay McVay Drilling POBox 2450 Hobbs, NM 88241</p> <p>mcmcvay@mcvaydrilling.com</p>	<p>Steven M. Feisal Chesapeake Energy Corporation 6100 N. Western Ave. Oklahoma City, OK 73118</p> <p>steven.feisal@chk.com</p>
<p>Ocean Munds-Dry, Esq. Post Office Box 2208 Santa Fe, New Mexico 87504 Telephone: (505) 988-4421</p> <p>omundsdry@hollandhart.com</p> <p>Attorney for McElvain Oil & Gas Properties, Inc</p>	<p>Leon A. Romero MAR Oil & Gas Corp. P. O. Box 5155 Santa Fe, NM 87502</p> <p>laromeo@marog.com</p>	<p>Coalition of AZ/NM Counties C/O Howard Hutchinson P.O. Box 4963 Santa Fe, New Mexico 87502</p> <p>aznmc@earthlink.net</p>