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**STATE OF NEW MEXICO
ENVIRONMENTAL IMPROVEMENT BOARD**

IN THE MATTER OF)
PROPOSED NEW REGULATION)
20.2.50 NMAC)
Oil and Gas Sector–Ozone Precursor Pollutants)

NO. EIB-21-27 (R)

**INDEPENDENT PETROLEUM ASSOCIATION OF NEW MEXICO’S
NOTICE OF INTENT TO PRESENT DIRECT TECHNICAL TESTIMONY**

The Independent Petroleum Association of New Mexico (“IPANM”), pursuant to 20.1.1.302 NMAC and the notice of this hearing, submits its Notice of Intent to Present Technical Testimony.

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

Independent Petroleum Association of New Mexico

IPANM is a non-profit 501c(6) that serves as the voice of the independent oil and gas producers in New Mexico, and advances and preserves the interests of independent oil and gas producers while educating the public to the importance of oil and gas to the state and all our lives. IPANM members range from small, independent oil and gas producers (upstream) to small, independent pipeline workers and production site transportation employees (midstream), to independent marketers, consultants, and bankers (downstream).

2. Identify each technical witness the person intends to present and state the qualifications of that witness, including a description of their educational and work background.

IPANM intends to present the following technical witnesses in this matter. The qualifications, including educational and work background of each of the IPANM technical witnesses, are described in detail in the pre-filed direct testimony of each witness. A copy of

their resumes are attached as **IPANM Exhibits 3, 5, and 7**. A summary for each IPANM technical witness is provided here:

A. Ryan Davis

Mr. Davis is the current president of IPANM. He is operations manager for Merrion Oil & Gas Corporation in Farmington, NM. He has been the operations manager for Merrion since January 2013. Before that, from July 2008 through December 2012, he was a production engineer with Merrion. Mr. Davis holds Bachelor of Science degree in mechanical engineering from the New Mexico Institute of Mining and Technology.

B. David Brown

Mr. Brown is the current vice-president of IPANM. He is the Manager of Regulatory, Government and Public Affairs for DJR Operating, LLC in Aztec, New Mexico. He has worked for DJR since 2018. From 2010 until 2018, he worked for Airswift Worldwide, consulting for oil and gas companies, including BP America, Chesapeake Energy, Fidelity Exploration and Production, and Ward Petroleum. From 2000 to 2010, he worked for BP America Production Company at various locations. From 1977 until 2010, he worked for Amoco Production Company at various locations, until Amoco was acquired by BP America. Mr. Brown holds a Bachelor of Science degree in business administration from Oral Roberts University and a Master of Science degree in environmental management and policy from the University of Denver.

C. Doug Blewitt

Mr. Blewitt is a principal with Air Quality Resource Management. He joined AQRM in 1999. From 1980 to 1999, he was employed by Amoco and BP, providing in house air quality expertise to all Amoco operating companies (refining, chemical, production, and minerals).

From 1999 to 2005 he was a member of the Colorado Air Quality Control Commission, where he served as Technical Secretary. Mr. Blewitt received a Bachelor of Arts degree from Milton College and has completed graduate work at the University of Wisconsin in water chemistry.

3. Include a copy of the direct testimony of each technical witness.

A copy of the direct testimony of each IPANM technical witness identified above is attached and designated **IPANM Exhibits 2, 4, and 6.**

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

IPANM's proposed modifications to the New Mexico Environment Department's ("NMED") proposed adoption of 20.2.50 NMAC, as provided in NMED's Petition for Regulatory Change, submitted May 4, 2021, are attached as **IPANM Exhibit 1.**

5. List and attach all exhibits anticipated to be offered by that person at the hearing, including any proposed statement of reasons for adoption of rules.

In addition to the attachments identified above and designated **IPANM Exhibits 1-x**, IPANM intends to offer additional exhibits at the hearing. The full index of IPANM exhibits includes:

Reference	Exhibit Title	IPANM Bates Range
IPANM Exhibit 1	Proposed Modifications	0001-0017
IPANM Exhibit 2	Testimony of R. Davis	0018-0039
IPANM Exhibit 3	Resume of R. Davis	0040-0041
IPANM Exhibit 4	Testimony of D. Brown	0042-0050
IPANM Exhibit 5	Resume of D. Brown	0051-0052
IPANM Exhibit 6	Testimony of D. Blewitt	0053-0067

Reference	Exhibit Title	IPANM Bates Range
IPANM Exhibit 7	Resume of D. Blewitt	0068
IPANM Exhibit 8	PowerPoint of D. Blewitt	0069-0101
IPANM Exhibit 9	Technical Review of the Farmington Mancos-Gallup Draft Resource Management Plan Amendment and Environmental Impact Statement	0102-0202

Respectfully Submitted:

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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2021, a copy of the foregoing *Independent Petroleum Association of New Mexico's Notice of Intent to Present Direct Technical Testimony* was served via electronic mail on the following:

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