

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

**APPLICATION OF DEVON ENERGY PRODUCTION COMPANY L.P. TO
REVOKE THE INJECTION AUTHORITY GRANTED BY ADMINISTRATIVE
ORDER SWD-640, LEA COUNTY, NEW MEXICO.**

CASE NO. 15397

SUBPOENA DUCES TECUM

TO: Devon Energy Production Company, L.P.
c/o James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504

Pursuant to NMSA 1978 § 70-2-8 and NMAC 19.15.4.16 you are hereby ORDERED to appear at 9:00 a.m. on December 18, 2015, at the offices of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico, and produce and make available to Oxy USA, Inc. and its attorneys, Holland & Hart, for examination and copying the documents, data, information and items specified in Attachment A.

This subpoena is issued on application of Oxy USA, Inc, through its attorney, Michael H. Feldewert of Holland & Hart LLP, Post Office Box 2208, Santa Fe, New Mexico 87504.

Dated this 4th day of December, 2015

NEW MEXICO OIL CONSERVATION DIVISION

BY: _____

Date: _____

David Hart

12/4/15

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ATTACHMENT A

**TO SUBPOENA DUCES TECUM
TO DEVON ENERGY PRODUCTION COMPANY, L.P.
IN NEW MEXICO OIL CONSERVATION DIVISION
CASE NO. 15397**

Produce the following and identify the paragraph to which each document or item of information is responsive:

1. All correspondence and notes generated as a result of discussions with Oxy personnel since August 1, 2015, regarding Oxy's Diamond 34 State Well No. 1 (API No. 30-025-33387) a salt water disposal well located in the SW/4 of Section 34, Township 22 South, Range 33 East, N.M.P.M., Lea County, New Mexico.
2. Documents identifying what Devon labeled "abnormally high water pressure at an approximate depth of 1,802 feet subsurface" in its Response to OXY's Motion to Dismiss and Quash Subpoena.
3. All documents generated while "examining possible sources of the high pressure outside of the SWD Well" as mentioned in Devon's Response to OXY's Motion to Dismiss and Quash Subpoena.
4. The mud records utilized to generate what is marked as "Exhibit A" to Devon's Response to OXY's Motion to Dismiss and Quash Subpoena.
5. All notes, readings, log entries, pressure measurements or other documents supporting or related to the contention that there was a "reduction of required back pressure....shortly after the Diamond SWD was shut in" as set forth in Paragraph 4 of the Verified Statement of Kyle Johnson.
6. All notes, log entries and other documents generated by the "rig PIC (Person in Charge)" in connection with the events set forth in Paragraph 4 of the Verified Statement of Kyle Johnson.
7. Records identifying water flows encountered by Devon during drilling operations within the townships listed below, including well names, API numbers, depth of water flows, pressure encountered, and required mud weights associated during well control operations.

T22S R32E, T22S R33E, T22S R34E, T23S R32E, T23S R33E, and T23S R34E

8. Permeability measurements or estimates within the Top of Salt (1,691' TVD), Base of Salt (5,008' TVD), and the Delaware formation (5,265' TVD) as set forth in Devon's Drilling Plan report.
9. The following documents with respect to Devon's North Thistle 34 State Com. No. 1H (API 3002542465):

- a. Daily drilling reports, including hourly breakdown of operations and drilling mud data. Drilling mud data should be inclusive of mud type, density, viscosity and chlorides.
 - b. Mud Reports or Mud Checks detailing mud characteristics (type, density, viscosity, and salinity).
 - c. Mud log and Mud loggers reports detailing oil & gas shows, flow information, lithology/sample descriptions and formation tops.
 - d. Records of any water analysis and gas analysis during any well control issues.
 - e. Hydrogen Sulfide (H₂S) monitor reports.
 - f. Wireline logs run in both cased-hole and open-hole sections (both PDF copy and LAS files).
 - g. Geo-Prog and Drilling Program including formation tops and expected hazards.
 - h. IADC reports.
 - i. Penless Recorder (Pason or MD Totco) in .csv or .txt file, time based, with time increments no greater than 5 minutes.
10. All documents Devon intends to introduce at the hearing in Case No. 15397 and which it believes supports the allegations set forth in its Application filed in Case No. 15397.

INSTRUCTIONS

This Subpoena Duces Tecum seeks all information available to you or in your possession, custody or control from any source, wherever situated, including but not limited to information from any files, records, computers documents, employees, former employees, consultants, counsel and former counsel. It is directed to each person to whom such information is a matter of personal knowledge.

When used herein, "you" or "your" refers to the persons and entity to whom this Subpoena Duces Tecum is addressed to including all of his or its attorneys, officers, agents, consultants, employees, directors, representatives, officials, departments, divisions, subdivisions, subsidiaries, or predecessors in interest.

The term "document" as used herein means every writing and record of every type and description in the possession, your custody or control, whether prepared by you or otherwise, which is in your possession or control or known by you to exist, including but not limited to all drafts, papers, books, writings, records, letters, photographs, computer disks, tangible things, correspondence, communications, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations or of

interviews, conferences, or meetings. It also includes diary entries, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, jottings, agenda, bulletins, notices, announcements, plans, specifications, sketches, instructions charts, manuals, brochures, publications, schedules, price lists, client lists, journals, statistical records, desk calendars, appointment books, lists, tabulations sound recordings, computer printouts, books of accounts, checks, accounting records, vouchers, and invoices reflecting business operations, financial statements, and any notice or drafts relating to the foregoing, without regard to whether marked confidential or proprietary. It also includes duplicate copies if the original is unavailable or if the duplicate is different in any way, including marginal notations, from the original.