

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

CASE NO. 14948

APPLICATION OF LOS LOBOS RENEWABLE POWER, LLC
(FORMS G-112) FOR APPROVAL TO INJECT INTO A
GEOTHERMAL AQUIFER THROUGH TWO PROPOSED
GEOTHERMAL INJECTION WELLS AT THE SITE OF THE
PROPOSED LIGHTNING DOCK GEOTHERMAL POWER
PLANT, HIDALGO COUNTY, NEW MEXICO.

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REQUEST FOR THE ISSUANCE OF SUBPOENA

COMES NOW the Protestant, Americulture, Inc., through its counsel of record, and pursuant to the Geothermal Resources Conservation Act, NMSA 1978, Section 71-5-17.2, hereby respectfully requests that the Commission issue a subpoena to compel the production of certain documents at the hearing scheduled for March 19, 2013 at Porter Hall, located at 1220 South St. Francis Drive, Santa Fe, New Mexico, to wit:

1. The March 22, 2012 Report prepared by John W. Shomaker, Ph.D, that was prepared in connection with, and following, the Tracer Test conducted under the January 18, 2012 letter from AMEC to Randy Dade at New Mexico Energy, Minerals and Natural Resources Department requesting temporary approval to conduct a tracer test in State Wells No 1, No. 3 and No. 4 for Lightning Dock geothermal H1-01, LLC, Hidalgo County, New Mexico, and the 1/18/2012 G-103 Sundry Notices for the same respective wells. For clarification, this March 22, 2012 Report is the same document reviewed by James Witcher at the AMEC facility on Thursday, February 28, 2013 and which counsel for AmeriCulture was informed is a document designated by Los Lobos as "Confidential" and which is not available as a public document.

Respectfully Submitted,



Charles N. Lakins
Lakins Law Firm, P.C.

I hereby certify that a true and correct copy of the foregoing was served via e-mail to the following counsel of record:

For Applicant Los Lobos
Michelle Henrie, Esq.
225 E. DeVargas
Santa Fe, NM 87504-1986

David Brooks, Esq.
New Mexico Oil Conservation Division
1220 S. St Francis Drive
Santa Fe, NM 87504



Charles N. Lakins

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THROUGH TWO PROPOSED GEOTHERMAL INJECTION WELLS AT THE SITE
OF THE PROPOSED LIGHTNING DOCK GEOTHERMAL POWER PLANT,
HIDALGO COUNTY, NEW MEXICO.

TO: Los Lobos Renewable Power, LLC
c/o Michelle Henrie, Esq.
225 E. DeVargas
Santa Fe, NM 87504-1986

SUBPOENA FOR PRODUCTION OF DOCUMENTS

YOU ARE HEREBY COMMANDED TO APPEAR as follows:

PLACE: New Mexico Oil Conservation Commission
Porter Hall
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

DATE: Tuesday, March 19, 2013

TIME: 9:00 a.m.

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To permit inspection and review of the following described document, which may be submitted into evidence at hearing before the New Mexico Oil Conservation Commission:

The March 22, 2012 Report prepared by John W. Shomaker, Ph.D, that was prepared in connection with, and following, the Tracer Test conducted under the January 18, 2012 letter from AMEC to Randy Dade at New Mexico Energy, Minerals and Natural Resources Department requesting temporary approval to conduct a tracer test in State Wells No 1, No. 3 and No. 4 for Lightning Dock geothermal H1-01, LLC, Hidalgo County, New Mexico, and the 1/18/2012 G-103 Sundry Notices for the same respective wells.



Janti Bailey
Chair, New Mexico Oil Conservation Commission
1220 South St. Francis Drive
Santa Fe, NM 87504

CERTIFICATE OF SERVICE BY ATTORNEY

I certify that I caused a copy of this subpoena to be served on the following persons and/or entities via e-mail on this _____ day of March 2013:

**TO: Los Lobos Renewable Power, LLC
c/o Michelle Henrie, Esq.
225 E. DeVargas
Santa Fe, NM 87504-1986**

Charles N. Lakins

Date of Signature: