

# MILLER STRATVERT

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April 5, 2006

## VIA FACSIMILE

Mr. Charles Lakins

Domenici Law Firm

6100 Seagull St., N.E., #205

Albuquerque, New Mexico 87109-2500

Re: NMOCD Case No. 13686; Amended Application of DKD, LLC for an Order  
 Revoking the Injection Authority for the Gandy Corporation State "T" Well No. 2,  
 Lea County, New Mexico

Dear Charles:

I have reviewed Gandy Corporation's Request for Subpoenas filed with the Division on  
 March 31, 2006 in the above matter.

Please be advised that DKD, LLC will produce materials responsive to items 1 and 2 on a  
 voluntary basis and therefore there will be no need for Gandy Corporation to obtain the issuance of a  
 formal subpoena duces tecum from the Division at this time.

Very truly yours,

MILLER STRATVERT P.A.



J. Scott Hall

cc: Ted Apodaca, Esq.  
 Florene Davidson  
 DKD, LLC

## A PROFESSIONAL ASSOCIATION

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April 5, 2006

VIA FACSIMILE to 505-476-3462

Total Fax 4 pages

Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505


RE: Matter of the Application of DKD, LLC for an Order Directing Gandy Corporation to Show Case, Lea County, New Mexico; Case No. 13686

Dear Ms. Davidson:

Please find attached Intervenor Gandy-Marley's *Subpoenas* for filing in the above captioned case. I sent a request for subpoenas last week and was informed that OCD needed subpoenas in form. As this is my first subpoena request to OCD, please let me know if the attached meet with OCD's approval. If not, please have appropriate OCD staff call me.

Thank you for your courtesies.

Sincerely,  
DOMENICI LAW FIRM, P.C.

  
\_\_\_\_\_  
Charles N. Lakins, Esq.

cc: 1679  
J. Scott Hall, Attorney for DKD

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Sylvia Rudy, Administrative Assistant  
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**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE APPLICATION OF  
DKD, LLC FOR AN ORDER DIRECTING  
GANDY CORPORATION TO SHOW CAUSE,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 13686**

**SUBPOENA FOR PRODUCTION OF DOCUMENTS**

**TO: Energen Resources Corporation  
CT Corporation System  
123 E MARCY  
SANTA FE NEW MEXICO 87501**

**YOU ARE HEREBY COMMANDED TO APPEAR as follows:**

**PLACE: New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505**

**DATE: April 21, 2006                      TIME: 10:00 a.m.**

**To permit inspection of the following described documents or objects:**

- 1. All documents in the care, custody and control of Energen Resources related to the Snyder "A" No. 1 Well (API No. 30-025-03727), including any sales contract and other documentation supporting Energen's attaining and selling of this well, complete and unedited well files, casing pressure logs, operator's monthly reports, and all regulatory documents including drilling permits, sundry reports, completion reports, letters, etc. pertaining to this well, explicitly including any documentation supporting a determination that the well had experienced a casing collapse at approximately 8825 feet.**
- 2. All documents in the care, custody and control of Energen Resources related to the Snyder "B" No. 2 Well (API No. 30-025-03729), including any sales contract and other documentation supporting Energen's attaining the well, complete and unedited well files, casing pressure logs, operator's monthly reports, and all regulatory documents including drilling permits, sundry reports, completion reports, letters, etc. pertaining to this well, explicitly including any documentation concerning a water blowout in April 2005, and**

any documentation supporting a determination that the well had experienced a casing collapse at 6365 feet.

3. All documents in the care, custody and control of Energen Resources related to the Snyder "A" Com 1-6 Well (API No. 30-025-34073), including any sales contract and other documentation supporting Energen's attaining the well, complete and unedited well files, casing pressure logs, operator's monthly reports, and all regulatory documents including drilling permits, sundry reports, completion reports, letters, etc. pertaining to this well.

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

1. All documents in the care, custody and control of Energen Resources related to the Snyder "A" No. 1 Well (API No. 30-025-03727), including any sales contract and other documentation supporting Energen's attaining and selling of this well, complete and unedited well files, casing pressure logs, and all regulatory documents including drilling permits, sundry reports, completion reports, letters, etc. pertaining to this well, explicitly including any documentation supporting a determination that the well had experienced a casing collapse at approximately 8825 feet.
2. All documents in the care, custody and control of Energen Resources related to the Snyder "B" No. 2 Well (API No. 30-025-03729), including any sales contract and other documentation supporting Energen's attaining the well, complete and unedited well files, casing pressure logs, and all regulatory documents including drilling permits, sundry reports, completion reports, letters, etc. pertaining to this well, explicitly including any documentation concerning a water blowout in April 2005, and any documentation supporting a determination that the well had experienced a casing collapse at 6365 feet.
3. All documents in the care, custody and control of Energen Resources related to the Snyder "A" Com 1-6 Well (API No. 30-025-34073), including any sales contract and other documentation supporting Energen's attaining the well, complete and unedited well files, casing pressure logs, and all regulatory documents including drilling permits, sundry reports, completion reports, letters, etc. pertaining to this well.

THIS SUBPOENA issued by or at request of:

Charles N. Lakins, Esq.,

Attorney for Intervenor Gandy Corporation

320 Gold Ave SW, Suite 1000, Albuquerque, N.M. 87102

Address

(505) 883-6250

Telephone

**CERTIFICATE OF SERVICE BY ATTORNEY**

I certify that I caused a copy of this subpoena to be served on the following persons entities by (hand - delivery) (mail) on this \_\_\_\_\_ day of April 2006:

**Energen Resources Corporation  
CT Corporation System  
123 E MARCY  
SANTA FE NEW MEXICO 87501**

\_\_\_\_\_  
Attorney for Oil Conservation Division

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date