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

APPLICATION OF MEWBOURNE OIL COMPANY TO REVOKE THE INJECTION AUTHORITY GRANTED UNDER SWD-744 FOR THE WILLOW LAKE WELL NO. 1 OPERATED BY PYOTE WELL SERVICE, LLC, EDDY COUNTY, NEW MEXICO.

CASE NO. 15519

OCCIDENTAL PERMIAN'S RESPONSE TO PYOTE'S SUBPOENA DUCES TECUM

Occidental Permian Limited Partnership ("OPL"), the operator of the Stent 2 Federal Com. #2H well (API No. 30-015-41221), files this response to the Subpoena Duces Tecum issued at the request of Pyote Water Solutions and Pyote SWD II LLC ("Pyote") dated September 15, 2016.

- 1. OPL objects to the request to produce the requested information within five days of receipt of the subpoena. OPL will produce the documents not subject to objection as soon as they can be gathered and prepared for production.
- 2. With respect to paragraph 1 of the Subpoena, OPL will produce the requested open-hole log.
- 3. With respect to paragraph 2 of the Subpoena, OPL will provide the daily drilling reports provided to its partners, but with redactions as necessary to protect against disclosure of confidential information.
- 4. With respect to paragraph 3 of the Subpoena, the completion and recompletion reports can be found in the Division's well files.
- 5. With respect to paragraph 4 of the Subpoena, OPL does not know what is requested by "all documents relating to the period of non-production for February, March and

April of 2015" and objects to this request as overly broad. Further, this brief period of non-production from the Stent 2H well in 2015, which was the result of a normal tubing failure, has no potential bearing on the issues raised by Mewbourne's application.

6. With respect to paragraph 5 of the Subpoena, OPL will produce the analysis of the water produced from the Stent 2H well that has previously been provided to Mewbourne.

Respectfully submitted,

HOLLAND & HART, LLP

Michael H. Feldewert

Jordan L. Kessler

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

ATTORNEYS FOR

OCCIDENTAL PETROLEUM LIMITED PARTNERSHIP

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 19th day of September, 2016 via electronic mailing to:

J. Scott Hall
Seth C. McMillan
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873
shall@montand.com
smcmillan@montand.com

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
(505) 982-2151 Facsimile
jamesbruc@aol.com

Michael H. Feldewert Jordan L. Kessler