

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

**APPLICATION OF MEWBOURNE OIL COMPANY TO
REVOKE THE INJECTION AUTHORITY GRANTED UNDER
SWD-774 FOR THE WILLOW LAKE WELL NO. 1
OPERATED BY PYOTE WELL SERVICE, LLC, EDDY
COUNTY, NEW MEXICO**

CASE NO. 15519

SUBPOENA DUCES TECUM

TO: Occidental Permian Limited Partnership
c/o Corporation Process Company
205 E. Bender, Suite 150
Hobbs, NM 88240

Pursuant to Section 70-2-8, NMSA (1978), and 19.15.4.16 NMAC of the New Mexico Oil Conservation Division's Rules of Procedure, you are hereby ORDERED to appear at 9:00 a.m., September 21, 2016 at the offices of the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505 and to produce and make available to Pyote Water Solutions LLC and Pyote SWD II LLC and their attorneys, J. Scott Hall, Esq. and Seth C. McMillan, Esq. for copying, the documents and items specified in Exhibit "A", attached.

This subpoena is issued on application of Pyote Water Solutions LLC and Pyote SWD II LLC through its attorneys Montgomery and Andrews, P.A., P.O. Box 2307 Santa Fe, New Mexico 87504.

Dated this 15th day of September, 2016.

NEW MEXICO OIL CONSERVATION DIVISION

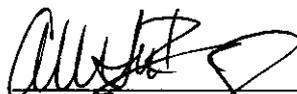
By:  for _____
David Catanach, Director

EXHIBIT "A"

The "Subject Well" means the Occidental Permian LP Stent "21" Federal Com. No. 2H Well the Occidental Permian LP Stent "21" Federal Com. No. 2H Well (API No. 30-015-41221) located in Section 21 Township 24 South, Range 28 East, N.M.P.M. in Eddy County, New Mexico.

For the Subject Well, produce the following documents and materials.

1. All well logs and associated LAS files, including that open-hole log dated December 16, 2013.
2. All internal daily drilling reports.
3. All completion and re-completion reports.
4. All documents relating to the period of non-production for February, March and April of 2015.
5. Any analyses of water produced from the Subject Well or delivered to the Pyote Willow Lake SWD No. 1 Well (API No. 30-015-21499) located in Section 22, Township 24 South, Range 28 East, N.M.P.M. in Eddy County, New Mexico.

These subpoena items are ongoing and you have the obligation to supplement the production of documents and materials responsive hereto as new documents and materials become available.

**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 21 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

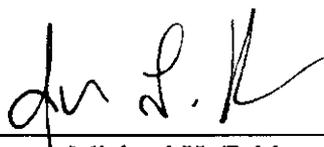
**ATTORNEYS FOR
OCCIDENTAL PETROLEUM LIMITED PARTNERSHIP**

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

SECOND BONE SPRINGS WELL PERFORMANCE COMPARISON

HZ WELL NORMALIZED OIL PRODUCTION - BONE SPRINGS 2 FORMATION

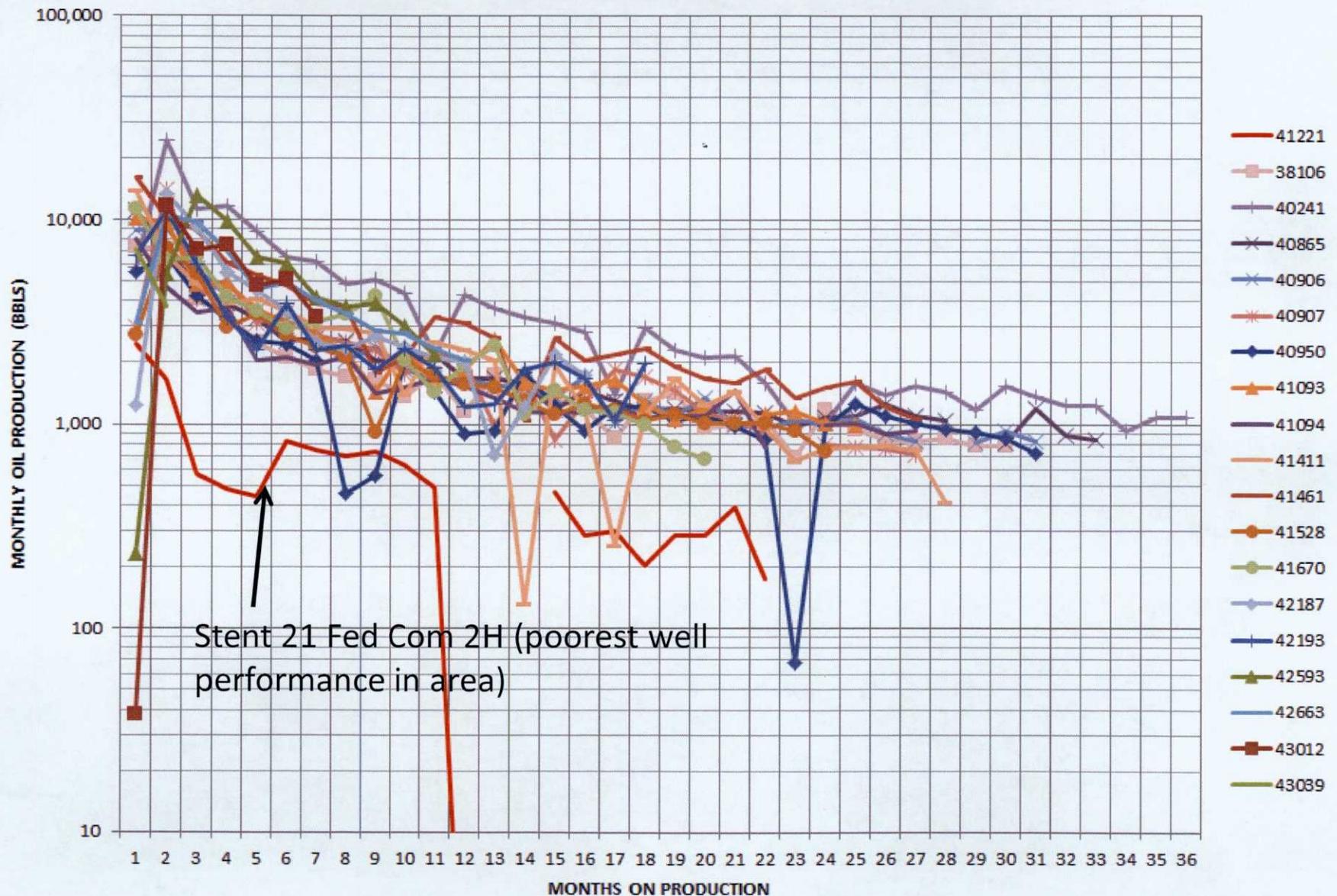


EXHIBIT A



**MONTGOMERY
& ANDREWS**
LAW FIRM

J. SCOTT HALL
Cell: (505) 670-7362
Email: shall@montand.com
www.montand.com

September 2, 2016

Michael H. Feldewert
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
mfeldewert@hollandhart.com

VIA EMAIL

**RE: 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**

Dear Mike:

On behalf of our client, we ask for Oxy's cooperation by providing us with the following documents and materials for the Occidental Permian LP Stent "21" Federal Com. No. 2H Well (Sec. 21 T24S R28E; API No. 30-015-41221):

1. All well logs and associated LAS files.
2. All daily drilling reports.
3. All completion and re-completion reports.
4. All documents relating to the period of non-production for February, March and April of 2015.

If possible, we would like to receive these documents on or before September 16th. It is hoped that Oxy will make these materials available to us voluntarily. Please let me know if we need to discuss.

Very truly yours,

J. Scott Hall

JSH:dj

cc: James Bruce, Esq.
Brian F. Antweil, Esq.

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307
Santa Fe, New Mexico 87504-2307

EXHIBIT B

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

APPLICATION OF MEWBOURNE OIL COMPANY TO
REVOKE THE INJECTION AUTHORITY GRANTED UNDER
SWD-774 FOR THE WILLOW LAKE WELL NO. 1
OPERATED BY PYOTE WELL SERVICE, LLC, EDDY
COUNTY, NEW MEXICO

CASE NO. 15519

SUBPOENA DUCES TECUM

TO: Occidental Permian Limited Partnership
c/o Michael H. Feldewert
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, NM 87504-2208

Pursuant to Section 70-2-8, NMSA (1978), and 19.15.4.16 NMAC of the New Mexico Oil Conservation Division's Rules of Procedure, you are hereby ORDERED to appear at 9:00 a.m., September 21, 2016 at the offices of the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505 and to produce and make available to Pyote Water Solutions LLC and Pyote SWD II LLC and their attorneys, J. Scott Hall, Esq. and Seth C. McMillan, Esq. for copying, the documents and items specified in Exhibit "A", attached.

This subpoena is issued on application of Pyote Water Solutions LLC and Pyote SWD II LLC through its attorneys Montgomery and Andrews, P.A., P.O. Box 2307 Santa Fe, New Mexico 87504.

Dated this 15th day of September, 2016.

NEW MEXICO OIL CONSERVATION DIVISION

By:  for
David Catanach, Director

EXHIBIT C

EXHIBIT "A"

The "Subject Well" means the Occidental Permian LP Stent "21" Federal Com. No. 2H Well the Occidental Permian LP Stent "21" Federal Com. No. 2H Well (API No. 30-015-41221) located in Section 21 Township 24 South, Range 28 East, N.M.P.M. in Eddy County, New Mexico.

For the Subject Well, produce the following documents and materials.

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4. All documents relating to the period of non-production for February, March and April of 2015.
5. Any analyses of water produced from the Subject Well or delivered to the Pyote Willow Lake SWD No. 1 Well (API No. 30-015-21499) located in Section 22, Township 24 South, Range 28 East, N.M.P.M. in Eddy County, New Mexico.

These subpoena items are ongoing and you have the obligation to supplement the production of documents and materials responsive hereto as new documents and materials become available.

HOLLAND & HART^{LLP}



Michael H. Feldewert
Recognized Specialist in the Area of
Natural Resources - Oil and Gas Law -
New Mexico Board of Legal Specialization
mfeldewert@hollandhart.com

September 22, 2016

VIA ELECTRONIC MAIL

J. Scott Hall
Montgomery & Andrews
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
shall@montand.com

Re: Case No. 15519: 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.

Scott:

Accompanying this letter are the following attachments responsive to Pyote's subpoena issued on September 15, 2016:

- LAS files (digital log files) for the open hole logs run on the Stent well (provided electronically) in response to paragraph 1;
- The daily drilling reports for the Stent well responsive to paragraph 2 (Oxy 1 through 103);
- Water analysis for the Stent well (Oxy 104 through 107).

Let me know if you have any problems opening the attachments.

Sincerely,

Michael H. Feldewert
ATTORNEY FOR
OCCIDENTAL PETROLEUM LIMITED PARTNERSHIP

EXHIBIT D

Holland & Hart

Phone [505] 988-4421 Fax [505] 983-6043 www.hollandhart.com

110 North Guadalupe Suite 1 Santa Fe, New Mexico 87501 Mailing Address P.O. Box 2208 Santa Fe, NM 87504-2208

Aspen Boulder Carson City Colorado Springs Denver Denver Tech Center Billings Boise Cheyenne Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C.

J. Scott Hall

From: J. Scott Hall
Sent: Thursday, September 22, 2016 1:50 PM
To: Michael Feldewert
Cc: jamesbruc@aol.com; jkessler@hollandhart.com; Brian F. Antweil - Katten Muchin Rosenman (brian.antweil@kattenlaw.com)
Subject: FW: Case No. 15519: Response to Subpoena Issued by Pyote
Attachments: 30015412210000.LAS; 2016-09-22 Letter to Hall from Feldewert.pdf; 2019-09-22 CASE NO. 15519_OXY - 1 THROUGH OXY - 107.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Mike,

Thank you for these.

We need to obtain the header and the comments section for the log. We also need the daily workover reports for the period when the well was not producing in 2015.

Scott

J. Scott Hall
Montgomery & Andrews, P.A.
P. O. Box 2307
Santa Fe, NM 87504-2307
shall@montand.com
(505) 986-2646



THIS MESSAGE CONTAINS INFORMATION WHICH MAY BE CONFIDENTIAL AND PRIVILEGED. UNLESS YOU ARE THE ADDRESSEE (OR AUTHORIZED TO RECEIVE FOR THE ADDRESSEE), YOU MAY NOT USE, COPY OR DISCLOSE TO ANYONE THE MESSAGE OR ANY INFORMATION CONTAINED IN THE MESSAGE. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PLEASE ADVISE THE SENDER BY REPLY E-MAIL TO shall@montand.com AND DELETE THE MESSAGE. THANK YOU.

From: Lisamarie Ortiz [<mailto:LOrtiz@hollandhart.com>]
Sent: Thursday, September 22, 2016 11:02 AM
To: J. Scott Hall
Cc: jamesbruc@aol.com; Michael Feldewert; Jordan L. Kessler; Lisamarie Ortiz
Subject: Case No. 15519: Response to Subpoena Issued by Pyote

Attached please find correspondence from Michael Feldewert and responsive documents. Please let me know if you have any problems with the attachments.

Thank you,

EXHIBIT E