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

**APPLICATION OF TAP ROCK RESOURCES,  
LLC FOR A NON-STANDARD SPACING AND  
PRORATION UNIT AND COMPULSORY  
POOLING, EDDY COUNTY, NEW MEXICO.**

**Case No. 16160**

**APPLICATION OF TAP ROCK RESOURCES,  
LLC FOR COMPULSORY POOLING, EDDY  
COUNTY, NEW MEXICO.**

**Case No. 16134**

**CHEVRON U.S.A. INC.'S RESPONSE TO SUBPOENA *DUCES TECUM***

Chevron U.S.A. Inc. ("Chevron") submits its Response to the Subpoena *Duces Tecum* issued by the Oil Conservation Division on the application of Tap Rock Resources, LLC ("Tap Rock") and dated May 4, 2018.

**Request No. 1:** Drilling schedules, including spudding date, drilling and completion schedules, and approximate dates of first production for each of the Wells.

**Response:** Chevron objects to this request to the extent that it requests information, data, and documents regarding Chevron's overall development plans for southeastern New Mexico that: (1) are confidential, proprietary, and competitively sensitive; and (2) have no relevance to the Chevron wells identified in the subpoena and to these cases. Subject to and without waiving its objections, Chevron is contemporaneously producing a responsive document (Bates no. CHEVRON 001).

**Request No. 2:** Status of APDs for each of the Wells, including filing dates and on-site reviews.

**Response:** Chevron objects to this request on the basis that: it (1) is vague and ambiguous; (2) is overly broad and unduly burdensome; and (3) seeks proprietary, confidential, and competitively sensitive information. Subject to and without waiving its objections, Chevron states that it submitted APDs for the SND 11 14 Fed Com 003 No. 4H, No. 5H, and No. 6H wells on May 9, 2018, that it has not submitted an APD for the SND 11 14 Fed Com 004 No. 4H well, and that on-site reviews of the SND 11 14 Fed Com 003 No. 4H, No. 5H, and No. 6H well sites were conducted on May 10, 2018. Chevron further states that it is contemporaneously producing responsive documents (Bates nos. CHEVRON 003 - 191).

**Request No. 3:** Proposed completion design for each of the Wells, including, but not limited to: design type, frac stages, proppant pounds per foot, and water in barrels per foot.

**Response:** Chevron objects to this request on the basis that it seeks proprietary, confidential, and competitively sensitive information. Subject to and without waiving its objections, Chevron states that it has not yet selected completion designs for the wells identified in the subpoena. Consequently, Chevron has no responsive documents.

**Request No. 4:** Final drilling, completion, and production costs from other Chevron wells in this are [sic] whose laterals are longer than 4620 feet.

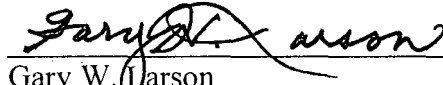
**Response:** Chevron objects to this request on the grounds that it: (1) is vague and ambiguous; (2) is overly broad and unduly burdensome; and (3) seeks proprietary, confidential, and competitively sensitive information.

**Request No. 5:** Production facility and marketing plans for each of the Wells.

**Response:** Chevron objects to this request on the basis that: (1) its marketing plans for the wells identified in the subpoena are inextricably embedded in Chevron's overall marketing plan for southeastern New Mexico, which contains proprietary, confidential, and commercially sensitive information and include information and documents that have no relevance to the Chevron wells identified in the subpoena and to these cases. Subject to and without waiving its objections, Chevron states that it is contemporaneously producing proposed facilities plans for a potential federal unit and other acreage in the vicinity of the wells identified in the subpoena. (Bates no. CHEVRON 002).

Respectfully submitted,

HINKLE SHANOR LLP

A handwritten signature in black ink, appearing to read "Gary W. Larson", is written over a horizontal line.

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*Counsel for Chevron U.S.A. Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of May, 2018 I served a true and correct copy of the foregoing Chevron U.S.A. Inc.'s Response to Subpoena *Duces Tecum* via email to:

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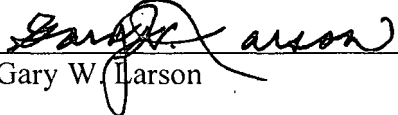
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