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

GANDY CORPORATION'S REQUEST FOR SUBPOENAS

COMES NOW the Intervenor Gandy Corporation, by and through counsel of record, and hereby requests that the Oil Conservation Division, under its authority set forth in NMAC 19.15.14.1214(A) issue subpoenas for the production of records related to the wells cited in DKD's Application. Intervenor requests that OCD issue the following subpoenas:

- 1. To Applicant DKD, LLC for all documents in the care, custody and control of DKD, LLC related to the Watson "6" No. 1 Well (API No. 30-025-34197), including any sales contract and other documentation supporting DKD'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.
- 2. To Applicant DKD, LLC for all documents in the care, custody and control of DKD, LLC related to the Snyder "A" No. 1 Well (API No. 30-025-03727), including any sales contract and other documentation supporting DKD'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.
- 3. To Energen Resources for 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.
- 4. To Energen Resources for 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

- DOMENICI-LAW-FIRM MAR. 31. 2006 11:59AM
 - any documentation supporting a determination that the well had experienced a casing collapse at 6365 feet.
 - 5. To Energen Resources for 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.

Respectfully Submitted. DOMENICI LAW FIRM, P.C.

Charles N. Lakins, Esq.

Attorneys for Gandy Corporation. 320 Gold Avenue SW, Suite 1000

Albuquerque, NM 87102

(505) 883-6250

I hereby certify that a true and correct copy of the foregoing was served via facsimile to all parties of record on the 31st day of March 2006.

Charles N. Lakins, Esq.

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