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EXHIBIT A

TO SUBPOENA DUCES TECUM TO RAPTOR RESOURCES INC. IN NEW MEXICO OIL CONSERVATION DIVISION CASE NO. 12015

DEFINITIONS AND INSTRUCTIONS

1. For purposes of this Exhibit "A", the "Subject Wells" are identified as follows:

All existing and proposed wells operated by Raptor Resources, Inc. situate in Section 8 and Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico.

- 2. For each of the Subject Wells, all of the following materials, documents or data:
 - A. The complete well file, including but not limited to all C-102 and C-104 forms naming you, and well logs.
 - B. All documents provided to the New Mexico Oil Conservation Division
 ("NMOCD") or the United States Bureau of Land Management;
 - C. Documents describing the drilling program for the subject wells, including approvals, schedules, timetables, contracts for drilling, and correspondence
 - D. Documents constituting or referring to engineering or geological evaluation concerning existing wells or the developing of additional wells.
 - Authorities for Expenditures and final compilations or statements of costs to complete all Subject Wells developed by you as operator.
- Documents reflecting the negotiations and transactions leading to and resulting in ownership by Dervish Energy LLC and Orr Holding Ltd., of interests in the leases underlying the Subject Wells.

- All documents relating to or supporting infill drilling programs recompletions or reworks you have adopted, recommended or implemented for gas wells in the Jalmat Gas Pool.
- 5. All documents, including but not limited to, reserve projections, corresponding pressure data, geological studies, engineering evaluations, and production data, whether generated by you or by consultants working on your behalf, or other persons which you have referenced or relied upon with respect to your request for unorthodox locations, simultaneous dedication or other development related to the Subject Wells.
- 6. All documents which reflect the ownership interest or operating rights of any kind in the proration units on which the Subject Wells are sited, or in the Subject Wells themselves if different from interests in the oil and gas leases, including all documents which establish Raptor Resources, Inc. status as operator of the Subject Wells and agreements between Raptor Resources Inc. and the owners of such interests.
- 7. All documents, including but not limited to (a) land files, (b) assignments and bills of sale, transfers of interest, assignments of interest in the Subject Wells, or of acreage on which the subject wells are located, between you and any other party, (c) lists of interest owners for the period 1998-1999 in the acreage comprising proration units for the subject wells, and (d) all communications to or from Raptor Resources Inc. with regard to the administrative applications to the NMOCD for the Subject Wells.

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- 8. All documents referencing any communication between you and the NMOCD, its Director, hearing examiners, agents, and employees, including but not limited to meeting notes, expense statements, telephone message slips, telephone bills, memoranda and correspondence, regarding your infill drilling activities for the Jalmat Gas Pool in Lea County, New Mexico.
- 9. Concerning offset operators to the Subject Wells provide:
 - (a) Copies of reports of any Lea County real estate title searches in 1999;
 - (b) Copies of offset operator plats along with receipts, cancelled checks or other documents which establish the date each plat was acquired.
 - (c) Each and every version of the October 20, 1999 letter, from Bill R. Keathly to Michael Stogner regarding Application to re-complete State "A" A/C Well No. 54 in Section 8, T-22-S, R-36-E, including all attachments to those letters.
 - (d) Documents evidencing the substitution at the NMOCD of the edition of the letter referenced in (c) above for the letter omitting Doyle Hartman as an offset operator with the letter including him as an offset operator both dated October 20, 1999.
- 10. Daily field reports, service company stimulation reports and any other documents showing the dates and nature of work done by you on the State "A" A/C-2 Well No. 54 at any time.

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