

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

**APPLICATION LG&E NATURAL PIPELINE, L.L.C.  
FOR SPECIAL POOL RULES FOR THE  
GRAMA RIDGE MORROW GAS STORAGE UNIT,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 12441**

CO-00-03-00001 D11  
CO JUN 23 11:12:41

**SUBPOENA DUCES TECUM**

TO: LG&E Natural Pipeline, L.L.C.  
c/o J. Scott Hall, Esq.  
Miller, Stratvert & Torgerson, P. A.  
Post Office Box 1986  
Santa Fe, New Mexico 87504

Pursuant to Section 70-2-8, NMSA (1978) and Rule 1211 of the New Mexico Oil Conservation Division's Rules of Procedure, you are hereby ORDERED to appear at 9:00 a.m., June 29, 2000, at the offices of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505 and to produce the documents and items specified in attached Exhibit A and to make available to Nearburg Exploration Company, L.L.C., and their attorney, William F. Carr, for copying, all of said documents.

This subpoena is issued on application of Nearburg Exploration Company, L.L.C., through their attorneys, Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208, Santa Fe, New Mexico 87504.

Dated this <sup>20</sup>23 day of June, 2000

**NEW MEXICO OIL CONSERVATION DIVISION**

BY: *Signed*  
**LORI WROTENBERY, DIRECTOR**

## **EXHIBIT "A"**

### **TO SUBPOENA DUCES TECUM TO LG&E NATURAL PIPELINE, L.L.C. IN NEW MEXICO OIL CONSERVATION DIVISION CASE 12441**

**PURPOSE:** The purpose of this subpoena is to provide all of the information necessary for Nearburg Exploration Company, L.L.C. to be able to prepare its opposition to LG&E Natural Pipeline, L.L.C., in New Mexico Oil Conservation Division Case 12441.

#### **PRODUCE THE FOLLOWING DOCUMENTS:**

(1) All reservoir pressure information from the date of inception of the Grama Ridge Morrow Gas Storage Unit including all bottomhole pressure tests and build-up test results, current well rates, flowing tubing pressures and choke sizes on each well within the Grama Ridge Unit and the area which is the subject of Oil Conservation Division Case 12441.

(2) All production injection and withdrawal information for each well in the Grama Ridge Morrow Gas Storage Unit.

(3) All well data on each well within the Grama Ridge Morrow Gas Storage Unit and the area surrounding the unit identified in LG&E's application to the Division in this case including complete well histories, work over histories and recompletion information.

(4) All geological and reservoir engineering mapping and interpretations of the Grama Ridge Morrow Storage Unit.

(5) All seismic data, geophysical mapping, and geophysical interpretations of the Grama Ridge Morrow Gas Storage Unit.

(6) All data presented to the Oil Conservation Division or the New Mexico State Land Office concerning the Grama Ridge Morrow Gas Storage Unit.

(7) All agreements related to the formation and operation of the Grama Ridge Morrow Gas Storage Unit including all unit agreements, operating agreements, Division of working interest agreements and all amendments and revisions thereto.

(8) All documents between LG&E Natural Pipeline, L.L.C. and its predecessors in interest concerning the boundaries of the Grama Ridge Morrow Gas Storage Unit.

(9) Copies of any and all geographical and geophysical data/studies and exhibits which LG&E Natural Pipeline, L.L.C. will use in support of its application in the hearing in this case. All data and other information which you have used, or will use in the preparation of these studies.

(10) Copies of any and all petroleum engineering data/studies and exhibits which LG&E Natural Pipeline, L.L.C. will use in support of its application in the hearing in this case. All data and other information which you have used, or will use in the preparation of these studies.

(11) Copies of all exhibits which LG&E will present in the Oil Conservation Division Examiner hearing in this case.

## INSTRUCTIONS

This Subpoena Duces Tecum seeks all information available to you or in your possession, custody or control from any source, wherever situated, including but not limited to information from any files, records, computers documents, employees, former employees, consultants, counsel and former counsel. It is directed to each person to whom such information is a matter of personal knowledge.

When used herein, "you" or "your" refers to the person or entity to whom this Subpoena Duces Tecum is addressed to including all of his or its attorneys, officers, agents, consultants, employees, directors, representatives, officials, departments, divisions, subdivisions, subsidiaries, or predecessors in interest.

The term "document" as used herein means every writing and record of every type and description in the possession, custody or control of LG&E Natural Pipeline, L.L.C., whether prepared by you or otherwise, which is in your possession or control or known by you to exist, including but not limited to all drafts, papers, books, writings, records, letters, photographs, computer disks, tangible things, correspondence, communications, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, minutes, reports and recordings of telephone or other conversations or of interviews, conferences, or meetings. It also includes diary entries, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, jottings, agenda, bulletins, notices, announcements, plans, specifications, sketches, instructions charts, manuals, brochures, publications, schedules, price lists, client lists, journals, statistical records, desk calendars, appointment books, lists, tabulations sound recordings, computer printouts, books of accounts, checks, accounting records, vouchers, and invoices reflecting business operations, financial statements, and any notice or drafts relating to the foregoing, without regard to

whether marked confidential or proprietary. It also includes duplicate copies if the original is unavailable or if the duplicate is different in any way, including marginal notations, from the original.