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

APPLICATION OF PETROGULF CORPORATION FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NO. 23506

SUBPOENA DUCES TECUM

To: James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 505-982-2043 Attorney for Mewbourne Oil Company

Pursuant to NMSA 1978, Section 70-2-8 and Rule 19.15.4.16(A) NMAC, you are hereby ordered to produce and make available to Petrogulf Corporation ("Petrogulf") and its counsel, Modrall Sperling, the documents, data, information, records, electronic data, and items specified in Attachment A on or before June 22, 2023. Any such documents shall be made available to Petrogulf's counsel via electronic delivery.

This subpoena is issued on application of Petrogulf through its attorney, Earl E. DeBrine, Jr. and Deana M. Bennett of Modrall Sperling, email address: <u>edebrine@modrall.com</u> and deana.bennett@modrall.com.

Dated this <u>16th</u> day of June, 2023.

NEW MEXICO OIL CONSERVATION DIVISION/COMMISSION
By:
Title: Director/Shair

Date: 6/16/2023

ATTACHMENT A

SUBPOENA DUCES TECUM TO MEWBOURNE OIL COMPANY CASE NO. 23506

Produce the following and identify the paragraph to which each document or item of information is responsive:

- Any and all well proposal letters, correspondence with BLM, and correspondence with working interest owners with regard to Mewbourne Oil Company's ("Mewbourne") proposed development of the E/2 of Section 34, Township 22 South, Range 26 East, NMPM, Eddy County, New Mexico and adjoining tracts that Mewbourne intends to include in horizontal spacing units that include the E/2 of Section 34, Township 22 South, Range 26 East, NMPM, Eddy County, New Mexico.
- 2. All the documents and exhibits Mewbourne intends to use to support its development plan and/or to oppose Petrogulf Corporation's ("Petrogulf") development plans, including but not limited to the documents and exhibits that it intends to use to support any proposals, development plans, applications, spacing, pooling or otherwise, involving the E/2 of Section 34, Township 22 South, Range 26 East, NMPM, Eddy County, New Mexico.
- 3. Resumes for all witnesses that Mewbourne intends to use, will call, or identifies in any pre-hearing filings, at and for the hearing before the Division.
- 4. Any geologic study or studies of the E/2 of Section 34, all of Section 35, and the W/2 of Section 36, Township 22 South, Range 26 East, NMPM, Eddy County, New Mexico.