

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

APPLICATION OF HUDSON OIL COMPANY OF TEXAS, WILLIAM A. HUDSON,  
AND EDWARD R. HUDSON FOR COMPULSORY POOLING, EDDY COUNTY, NEW  
MEXICO.

CASE NO. 13598

**SUPPLEMENT TO REPLY IN SUPPORT OF HUDSON'S MOTION TO QUASH  
SUBPOENAS**

HUDSON OIL COMPANY OF TEXAS, WILLIAM A. HUDSON AND EDWARD R. HUDSON (collectively "Hudson"), provides the Division with this Supplement to its Reply in Support of Hudson's Motion to Quash Subpoenas issued to Ard Oil, Ltd. and Ard Energy, Ltd. (collectively "the Ards"). In support of this Reply, Hudson states:

Under the Rules of Civil Procedure, a Sur-Reply is only allowed by leave of the court. However, without first obtaining Division approval, the Ards have proceeded with this Sur-Reply because they are still groping for an argument that continues to evade them. The Ards simply cannot find one reason why William A. Hudson, Edward R. Hudson and Randall Hudson should be required to travel thousands of miles to attend a hearing where their testimony is not needed. Mr. Miller will be present and prepared to testify on all relevant issues in this case.

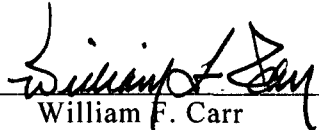
Although the Ards state that the Hudsons "should know the issues and facts on which they should testify," (*See* Sur-Reply ¶C.1.) the purpose of the Hudson's testimony still even evades the Ards. The best Ard has been able to do is to state that the substance of the Hudson's testimony "can only be determined at the hearing." *See* Response art ¶ 6.

The subpoenas were obtained for the sole purpose of harassment. Until the Ards can articulate a reason to compel Hudson's testimony, the subpoenas impose an unreasonable

burden on the Hudsons and should be quashed. To quote Mr. Bruce, well-articulated summary of his argument: "Enough said."

Respectfully submitted,

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ATTORNEYS FOR HUDSON OIL COMPANY OF  
TEXAS

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of January 2006, I have caused to be delivered by facsimile a copy of Hudson Oil Company of Texas' Reply in Support of Motion to Quash Subpoena in the above-captioned case to the following:

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