

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

2008 OCT 15 AM 10 29

**IN THE MATTER OF THE APPLICATION  
OF THE NEW MEXICO OIL CONSERVATION DIVISION  
THROUGH THE ENFORCEMENT AND COMPLIANCE  
MANAGER, FOR A COMPLIANCE ORDER IMPOSING  
PENALTIES AND CANCELLING OR SUSPENDING THE  
AUTHORITY OF QUANNAH, INC. TO TRANSPORT  
LIQUID WASTES.**

**CASE NO. 14110**  
*De Novo*

**RESPONSE TO SUBPOENA DUCES TECUM**

Quannah, Inc., for their response to the Subpoena Duces Tecum issued by the New Mexico Oil Conservation Division on September 19, 2008 responds to the Subpoena as shown on the individual response for each request attached hereto:

- No. 1 Articles of incorporation and related corporate filings in Nevada.
- No. 2 None.
- No. 3 Corporate documents identifying the corporate officers.
- No. 4 Documents identifying Quannah, Inc.'s employees.
- No. 5 Price sheet, bid sheet and customer list of Quannah, Inc.
- No. 6 Balance sheet and Inventory List of Quannah, Inc. as of September 1, 2008.
- No. 7
  - a. Bill of Sale for the sale of assets of Quannah, Inc. to G & L Trucking, Inc. (no trucks)
  - b. Form 941 – Employer's Quarterly Federal Tax Return
  - c. G & L Trucking, LLC Retained Employees Agreement.
- No. 8 Lease Agreement between Quannah, Inc. and G & L Trucking, Inc.
- No. 9 None.
- No. 10 Invoices and payment documents for R & B Roustabout Services LLC
- No. 11 E-mails by and between Louis Edgett and Bruce Martin
- No. 12 a. Quannah, Inc invoices and work orders for hauling water for the State R Well for January and February, 2008.
- No. 13 None.
- No. 14 Oil Gauge Sheet for the State R battery
- No. 15 All run tickets and invoices for Quannah's transportation of water on February 7, 2008.

No. 16 Pictures of the State R water tank and surrounding area after the tank valve and the tank failed on or about September 5, 2008.  
No. 17 Affidavit of Karen J. Dunn

PADILLA LAW FIRM P.A.

By:   
Ernest L. Padilla  
Post Office Box 2523  
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(505) 988-7577

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Response to Subpoena Duces Tecum was hand-delivered to Gail MacQueston, Assistant General Counsel, New Mexico Oil Conservation Division, 1220 S. St. Francis Drive, Santa Fe, New Mexico 87505, this 15th day of October, 2008.

  
ERNEST L. PADILLA