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

IN THE MATTER OF THE HEARING CALLED BY
THE OIL CONSERVATION DIVISION FOR THE
PURPOSE OF CONSIDERING:

APPLICATION OF TARGA MIDSTREAM SERVICES
LIMITED PARTNERSHIP FOR APPROVAL OF A   CASE NO. 14192
ACID GAS INJECTION WELL(S)
LEA COUNTY, NEW MEXICO

AMENDED SUBPOENA DUCES TECUM

TO: Targa Midstream Services Limited Partnership
      c/o J. Scott Hall, Esq.
      Montgomery & Andrews, P.A.
      P. O. Box 2307
      Santa Fe, New Mexico, 87504-2307

        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
8:15 a.m., October 30, 2008, to the offices of the Oil Conservation Division, 1220 S. St.
Francis Drive, Santa Fe, New Mexico, 87505 and to produce the documents and items
specified in attached Exhibit A and to make available to Range Operating New Mexico,
Inc. and their attorney, W. Thomas Kellahin, for copying, all of said documents.

This amended subpoena is issued on application of Range Operating New Mexico, Inc. through their attorneys, Kellahin & Kellahin, 706 Gonzales Road, Santa Fe, New Mexico 87501 to replace the original subpoena issued on October 10, 2008

Dated this _21__day of October, 2008.

NEW MEXICO OIL CONSERVATION DIVISION

By *David K. Brooks*
Assistant General Counsel

BY: _____

MARK FESMIRE, DIRECTOR

EXHIBIT "A"
TO AMENDED SUBPOENA DUCES TECUM
TO TARGA MIDSTREAM SERVICES LIMITED PARTNERSHIP
IN NEW MEXICO OIL CONSERVATION DIVISION
CASE 14192

PURPOSE: The purpose of this amended subpoena is to provide all of the information necessary for Range Operating New Mexico Inc. to be able prepare its opposition to Targa Midstream Services Limited Partnership in Case 14192

THE DATA TO BE PRODUCED INVOLVES
THE
SAN ANDRES FORMATION

PRODUCE THE FOLLOWING DOCUMENTS

(1) Any injectivity studies for the Section 3 AGI wellbore project,

(2) A copy of any technical report or study that could be used by Targa for this case, including but not limited to, any report and/or study by Geolex and/or Alberto Gutierrez.

(3) Any study equivalent to that of the Geolex study in Section 27,

(4) Exhibits/data illustrating Traga's concept of how the acid gas would be contained in formation,

(5) Exhibits/data showing how Targa expect the acid gas to affect offset production in the same interval Targa want to injecting in to.

(6) Log Data: If used by Targa for this case, then identify each well and the available data:

    a. Mudlogs or strip logs indicating formation data.
    b. Openhole logs, including but not limited to density/neutron porosity, resistivity and sonic logs
    c. Case-hole logs, including cement bond logs with collar locator and any casing inspection logs that have been run to verify mechanical integrity.
    d. All data analysis and reports from cores and side-wall cores obtained.

(7) Fluid Data: If used by Targa for this case, then

    e. All DST reports, including pressure charts, fluid recovery data and observed flow rates, together with service company analysis thereof with respect to reservoir parameters.
    f. All daily drilling reports from spud until the production casing was run.
    g. All completion reports including all intervals perforated and stimulated.

(8) Gas-Water Contact Data: If used by Targa for this case, then

    a. All evidence utilized or which can be utilized in establishing the level of gas/water contact,
    b. both the Original and the Current gas/water contacts are the concern.

(9) Reservoir Data: If used by Targa for this case, then

    a. Temperature data
    b. Reservoir pressure data, **by individual zone (perforation)** including but not limited to bottom-hole surveys or pressures, surface pressure readings, daily tubing pressure and casing pressures, drill stem tests, build-up tests and interference tests, with relevant information as to shut-in time and production rates prior to shut-in.

(10) Production Data: if used by Targa for this case, then

    a. all production data including, but not limited to all well check records, including gauges/charts for each well on a daily basis from initial testing/completion to date showing actual production of oil, gas and water for said well per day and per month.

b. Chronological reports to include details of:
    (i) perforating and perforation locations
    (ii) stimulation fluids, volumes, rates,
    (iii) and pressures for each treated interval
c. Swabbing, flowing and/or pumping results for each interval that was perforated and tested including Pre and Post stimulation results as applicable.

(11) Reservoir Simulation: If used by Targa for this case, any reservoir simulation which includes any of the subject wells, then provide: model software description, model parameters and assumptions, model variables, model history matching data, model predictions, subsequent modification.

(12) Any petroleum engineering data used or to be used by Targa to justify its position in NMOCD Case 14192 including all pressure data, including but not limited to bottom hole pressure surveys, daily tubing pressure and casing pressure surveys, with relevant information as to shut-in time and production/injection rate prior to shut-in;

(13) Any and all reserve calculations, including but not limited to estimates of ultimate recovery, production decline curves, pressure decline curves, material balance calculations (including reservoir parameters), volumetric calculation (including reservoir parameters);

(14) Any and all reservoir studies, including but not limited to drainage calculations, well interference studies, pressure studies or well communication studies;

(15) Any and all documents and data concerning "workover" actually conducted, attempted or contemplated;

(16) Reservoir Geology: If used by Targa for this case: Any geologic data including geologic maps, structure maps, isopachs, cross-sections, and/or logs being used by Targa to justify its position;

(17) Seismic Data: If used by Targa for this case, then

(1) all seismic data, including:

a. vertical seismic profile line (north-south trace through and extending one mile in each direction from the subject well location)

b. vertical seismic profile line (east-west line through and extending one mile in each direction from the subject well location)

c. Targa's conversion of the San Andres top time structure into a structure map showing actual depths,

d. any and all information concerning the acquisition, processing and interpretation of the 3-D seismic data;

e. copies of the geophysical interpreter's report, including all maps and input data;

f. predesign of the 3-D survey including the resolution, bin size, number of bins, number of pre and post-stack tracs;

g. identify and describe the seismic calculation (computer) program used;

h. any and all seismic profiles and time sections;

i. list of all ties and mis-ties to well data;

j. any velocity maps, including isochron or velocity converted depth maps;

k. details on digitization of maps, including a detailed description of the software package for reduction of the digitized data;

l. details, including any adjustment of parameters for map construction including depth conversion; and

m. copies of any and all maps including initial and final isopach contour maps of structure and any "isometric displays" or presentations.

(18) Targa's Hearing Exhibits:

(1) copies of any geologic data and exhibits including geologic maps, structure maps, isopachs, cross-sections, and/or logs to be used by Targa.

(2) copies of any and all geophysical data/studies and exhibits to be used by Targa, including gas/water migration studies.

(3) copies of any and all petroleum engineering data/studies and exhibits to be used by Targa, including acid gas effects on productive wells and the source of the acid gas for disposal.

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, agent, consultants, employees, directors, representatives, officials, departments, divisions, subdivisions, subsidiaries, or predecessors.

The term "document" as used herein means every writing and record of every type and description in the possession, custody or control of Targa Midstream Services Lkimited Partnership and/or Geolex, 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