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RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

October 31, 1996

HAND DELIVERED
8:30 AM

William F. Carr, Esq.
Campbell, Carr & Berge
110 N. Guadalupe
Santa Fe, New Mexico 87501

Re: Subpoena Duces Tecum
NMOCD Case 11648
Application of Mewbourne Oil Company

Dear Mr. Carr:

On behalf of CT-R, Ltd. Company and Chantrey Corporation, I am delivering to you the original of the enclosed and referenced subpoena.

If you are unable to accept the subpoena for your client, please call me. Otherwise, I have enclosed an acceptance for your signature, and would appreciate you signing and returning it to me today.

Very truly yours,



W. Thomas Kellahin

cfx: Michael E. Stogner (NMOCD)
cfx: Denise Wann (CT-R, Ltd.)

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

RECEIVED

NOV 3 1996

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

CASE NO. 11648

THE APPLICATION OF MEWBOURNE OIL COMPANY
FOR COMPULSORY POOLING, A NON-STANDARD
PRORATION UNIT AND AN UNORTHODOX WELL
LOCATION, LEA COUNTY, NEW MEXICO.

SUBPOENA DUCES TECUM

TO: MEWBOURNE OIL COMPANY
c/o William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan
P. O. Box 2208
Santa Fe, New Mexico. 87504-2208

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., November 4, 1996, to 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 CT-R, LTD, COMPANY and Chantrey Corporation and their attorney, W. Thomas Kellahin, for copying, all of said documents.

This subpoena is issued on application of CT-R. Ltd. Company and Chantrey Corporation through their attorneys, Kellahin & Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

Dated this 30th day of October, 1996.

NEW MEXICO OIL CONSERVATION DIVISION

BY:

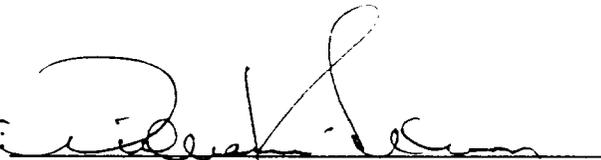

WILLIAM J. LEMAY, DIRECTOR

EXHIBIT "A"

**TO SUBPOENA DUCES TECUM
TO MEWBOURNE OIL COMPANY
IN NEW MEXICO OIL CONSERVATION DIVISION
CASE 11648**

PURPOSE: The purpose of this subpoena is to provide all of the information necessary for CT-R, Ltd. Company and Chantrey Corporation to be able to its opposition to Mewbourne Oil Company in NMOCD Case 11020

I. PRODUCE THE FOLLOWING DOCUMENTS:

for EACH AND ALL of the following Mewbourne Oil Company wells in T19S, R37E, Lea County, New Mexico:

A. WELLS:

- (1) Eumont "21" State Well No. 1, proposed to be drilled in Unit M of Section 21,
- (2) Huston Com #1-K Well, producing in Unit K of Section 21,
- (3) State F Com #2 Well, producing in Unit O of Section 29

B. DOCUMENTS:

1. Open-hole Resistivity logs, e.g. Dual Latrologs supplying both a one-inch scale log and five-inch scale log.
2. Open-hole Porosity logs, e.g., Compensated Neutron-Litho-Density supplying both a one-inch scale log and five-inch scale log.

3. Mudlogs
4. All cased hole production logs, including but not limited to caliper logs, spinner surveys, tracer surveys.
5. Fluid data, including recombination analysis or bottom hole analysis
6. Reservoir temperature data
7. PVT data. PVT reports and gas analysis including but not limited to molecular weight and API gravity.
8. Reservoir pressure data 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.
9. Gas-liquid ratios and tests including a description of any and all test data and zones per well.
10. any core data and analysis including but not limited to conventional or sidewall core data and samples.
11. 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 each well per day and per month.
12. Chronological reports to include details of:
 - a. perforating and perforation locations
 - b. stimulation fluids, volumes, rates, 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.

13. If your client has conducted any reservoir simulation which includes either of the subject wells, then provide: model software description, model parameters and assumptions, model variables, model history matching data, model predictions, subsequent modification.

14. Any petroleum engineering data used or to be used by Mewbourne Oil Company to justify its application in NMOCD Case 11648 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 rate prior to shut-in;

15. 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);

16. Any and all reservoir studies, including but not limited to drainage calculations, well interference studies, pressure studies or well communication studies;

17. Any and all documents and data concerning "workover" actually conducted, attempted or contemplated;

18. Any geologic data including geologic maps, structure maps, isopachs, cross-sections, and/or logs being used by Mewbourne Oil Company to justify its application;

19. Any and all geologic and/or engineering studies and interpretations by which Mewbourne Oil Company justifies and evaluates this application;

20. Any and all contracts, communitization agreements, joint operating agreements, leases, correspondence, farmout agreements that apply to any of the subject wells;

21. A detailed accounting of all expenses and revenues for any of the subject wells.

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.

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The term "document" as used herein means every writing and record of every type and description in the possession, custody or control of Mewbourne Oil Company, 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.