

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

**APPLICATION OF OCEAN ENERGY RESOURCES,
INC. FOR A NON-STANDARD OIL SPACING
AND PRORATION UNIT, LEA COUNTY,
NEW MEXICO.**

CASE NO. 12450

SUBPOENA DUCES TECUM

TO: Ocean Energy Resources, Inc.
c/o James Bruce, Esq.
Post Office Box 1056
Santa Fe, New Mexico 87504

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 9:00 a.m., July 24, 2000, at 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 Yates Petroleum Corporation, and their attorneys, William F. Carr and Michael H. Feldewert, for copying, all of said documents.

This subpoena is issued on application of Yates Petroleum Corporation, through their attorneys, Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208, Santa Fe, New Mexico 87504.

Dated this 19th day of July, 2000

NEW MEXICO OIL CONSERVATION DIVISION

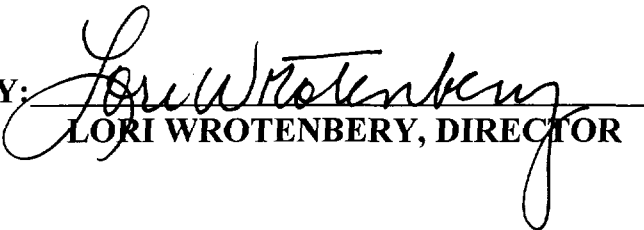
BY: 
LORI WROTENBERY, DIRECTOR

EXHIBIT "A"

**TO SUBPOENA DUCES TECUM
TO YATES PETROLEUM CORPORATION
IN NEW MEXICO OIL CONSERVATION DIVISION
CASE 12450**

PURPOSE: The purpose of this subpoena is to provide all of the information necessary for Yates Petroleum Corporation to be able to prepare its opposition to Ocean Energy Resources, Inc., in New Mexico Oil Conservation Division Case 12450.

PRODUCE THE FOLLOWING DOCUMENTS:

(1) All documents which related to Ocean's decision to drill the Townsend State "2" Well No. 11 including but not limited to all documents concerning Ocean's decision that a second well is needed to drain the porosity pod in which its Townsend State Well No. 5 is completed.

(2) All well data on the Townsend State Well No. 5 including all pressure information from the Townsend State Well No. 5 including all bottomhole pressure tests and build-up test results, current well rates, flowing tubing pressures and choke sizes on this well.

(3) All production information on the Townsend State Well No. 5.

(4) All documents related to the overproduction of the allowable by the Townsend State Well No. 5.

(5) All volumetric calculations on all porosity pods in the South Big Dog-Strawn Pool.

(6) All other documents or data which show that the Townsend State Well No. 5 would be damaged by its being shut-in until all over production is made up.

(7) All geological and reservoir engineering mapping and interpretations of the South Big Dog-Strawn Pool and the individual porosity pods therein.

(8) All seismic data, geophysical mapping, and geophysical interpretations of the South Big Dog-Strawn Pool and the porosity pods therein.

(9) Copies of any and all geographical and geophysical data/studies and exhibits which Ocean Energy Resources, Inc. will use in support of its application in the hearing in this case. All data and other information which you have used, or will use in the preparation

of these studies.

(10) Copies of any and all petroleum engineering data/studies and exhibits which Ocean Energy Resources, Inc. will use in support of its application in the hearing in this case. All data and other information which you have used, or will use in the preparation of these studies.

(11) Copies of all exhibits which Ocean Energy Resources, Inc. will present in the Oil Conservation Division Examiner hearing in this case.

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, agents, consultants, employees, directors, representatives, officials, departments, divisions, subdivisions, subsidiaries, or predecessors in interest.

The term "document" as used herein means every writing and record of every type and description in the possession, custody or control of Ocean Energy Resources, Inc., 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.