

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

**APPLICATIONS OF COLGATE OPERATING, LLC
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO**

CASE NOS. 23149-56

SUBPOENA DUCES TECUM

TO: Colgate Operating, LLC
c/o Dana Hardy, Esq.
Hinkle Shanor, LLP
P.O. Box 2068
Santa Fe, New Mexico 87504-2068
dhardy@hinklelawfirm.com

Pursuant to NMSA 1978 Section 70-2-8, and Rule 19-15.4.16 NMAC, you are hereby ORDERED to produce the documents and items specified below on or before 9:00 a.m. on November 28, 2022 at the offices of the Gallegos Law Firm, P.C., counsel for Doyle and Margaret Hartman, 460 St. Michael's Drive, Building 300, Santa Fe, New Mexico 87505:

1. A complete copy (including all exhibits and attachments) of the November 25, 1941 operating agreement between The W-K Royalty Company, R. Olsen Oil Company and Cities Service Oil Company. The agreement is referenced in the June 14, 2022 Original Drilling and Division Order Title Opinion prepared for Colgate by Steven S. Toeppich & Assoc., PLLC.

2. A complete copy (including all exhibits and attachments) of the May 16, 1949 agreement between R. Olsen Oil Co, E. A. Culbertson and Cities Service Oil Company providing for operation of the leasehold estate by Cities Service Oil Co. The

agreement is referenced in the June 14, 2022 Original Drilling and Division Order Title Opinion prepared for Colgate by Steven S. Toeppich & Assoc., PLLC.

3. Copies of all applications for permits to drill (APDs) filed with the Bureau of Land Management by Colgate or on its behalf for the Batman wells at issue in OCD Cases 22788-22795 and 23149-23156.

4. Copies of all applications for permits to drill (APDs) filed with the Bureau of Land Management by Colgate or on its behalf for the Robin wells at issue in OCD cases 22861-22868.

5. Documents reflecting all communications between Colgate and the Bureau of Land Management related to the Batman wells and the Robin wells.

This subpoena is issued on the application of Doyle and Margaret Hartman through their attorneys, the Gallegos Law Firm, P.C.

Dated this 17th day of November 2022.

NEW MEXICO OIL CONSERVATION DIVISION

By


ADRIENNE SANDOVAL, DIRECTOR