BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF GILLESPIE-CROW, INC. FOR UNIT EXPANSION, STATUTORY UNITIZATION, AND QUALIFICATION OF THE EXPANDED UNIT AREA FOR THE RECOVERED OIL TAX RATE AND CERTIFICATION OF A POSITIVE PRODUCTION RESPONSE PURSUANT TO THE "NEW MEXICO ENHANCED OIL RECOVERY ACT," LEA COUNTY, NEW MEXICO.

No. 11724

SUBPOENA DUCES TECUM

TO: Snyder Ranches, Inc. and Larry Squires c/o W. Thomas Kellahin, Esq. Kellahin & Kellahin
117 North Guadalupe Street
Santa Fe, New Mexico 87501

PECENTED MAR 21 1997

Oil Conservation Division

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., April 10, 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 Company and Hanley Petroleum Inc. and their attorney, William F. Carr, for copying, all of said documents.

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

Dated this $\frac{3/5^{+}}{}$ day of March, 1997.

NEW MEXICO OIL CONSERVATION DIVISION

BY:

WILLIAM J. LEMAY, DIRECTOR

EXHIBIT "A"

TO SUBPOENA DUCES TECUM TO SNYDER RANCHES, INC. AND LARRY SQUIRES IN NEW MEXICO OIL CONSERVATION DIVISION CASE 11724

PURPOSE: The purpose of this subpoena is to provide all of the information necessary for Yates Petroleum Company and Hanley Petroleum Inc. to be able to prepare its opposition to Gillespie-Crow, Inc. in NMOCD Case 11724.

I. PRODUCE THE FOLLOWING DOCUMENTS:

A. DOCUMENTS:

1. All data utilized in the determination of the outer boundary (zero production limit) of the West Lovington Strawn Pool/Unit;

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 Snyder Ranches, Inc. and/or Larry Squires, 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.