

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

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

**CASE NO. 11157**

**APPLICATION OF OXY USA INC. FOR  
AN UNORTHODOX GAS WELL LOCATION AND  
SIMULTANEOUS DEDICATION, LEA COUNTY,  
NEW MEXICO.**

**SUBPOENA DUCES TECUM**

TO: OXY USA Inc.  
Post Office Box 50250  
Midland, Texas 79710

Pursuant to N.M. Stat. Ann. (1987 Repl. Pamp.) § 70-2-8 and Oil Conservation Division Rule 1211, you are hereby ORDERED to appear at 8:15 a.m. on December 1, 1994, at the offices of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico, and to produce the documents and items specified below, and make them available for examination and copying by personnel from Conoco Inc. and its attorney, James Bruce:

1. A land plat or topographic map showing Section 30, Township 19 South, Range 37 East, which identifies and locates all pipelines, roads, terrain features, and any and all surface conditions which prevent your State "E" Well No. 6 from being located and drilled at any orthodox surface location in the SW $\frac{1}{4}$  of Section 30, including an orthodox well location in the NE $\frac{1}{4}$ SW $\frac{1}{4}$  and/or SW $\frac{1}{4}$ SW $\frac{1}{4}$  of Section 30.

2. Any geologic document, including geologic maps, structure maps, isopachs, cross-sections, and logs, being used or which could be used by you in this case.
3. Any information or document regarding directional drilling of the State "E" Well No. 6, or which could be used to show why directional drilling of said well to reach an orthodox bottom-hole location is not feasible.

#### **INSTRUCTIONS**

A. 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, computer, 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.

B. When used herein, "you" or "your" refers to OXY USA Inc. and its attorneys, officers, agents, consultants, employees, directors, representatives, officials, departments, divisions, subdivisions, subsidiaries, or predecessors.

C. The term "document" as used herein means every writing and record of every type and description in your possession, custody, or control, whether prepared by you or otherwise, known by you to exist. It includes duplicate copies if the original

document is unavailable, or if the duplicate is different in any way, including marginal notations, from the original document.

This subpoena is issued on application of Conoco Inc. through its attorneys, Hinkle, Cox, Eaton, Coffield & Hensley, Post Office Box 2068, Santa Fe, New Mexico 87504.

Dated this 23rd day of November, 1994.

OIL CONSERVATION DIVISION

BY:

  
WILLIAM J. LEMAY, DIRECTOR