

BEFORE THE

OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

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

RECEIVED

JUL 11 1995

THE APPLICATION OF PHILLIPS PETROLEUM
COMPANY, FOR A DETERMINATION IN
ACCORDANCE WITH SECTION 70-2-33(H)
NMSA (1978) OF PROPORTIONATE SHARE OF
RECOVERABLE HYDROCARBONS AND FOR THE
ADOPTION OF A SPECIAL ALLOWABLE FOR THE
SOUTH PETERSON-FUSSELMAN OIL POOL,
ROOSEVELT COUNTY, NEW MEXICO.

Oil Conservation Division

CASE NO. 11334

SUBPOENA DUCES TECUM

TO: PHILLIPS PETROLEUM COMPANY
c/o W. Thomas Kellahin
Kellahin & Kellahin
117 North Guadalupe Street
Santa Fe, New Mexico 87501

Pursuant to Section 70-2-8 NMSA (1978) and Rule 1211 of the New Mexico Oil Conservation Division's Rules of Procedure, and in accordance with the power vested in this Division, you are commanded to appear at 8:15 a.m., July 13, 1995, 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 Enserch

Exploration, Inc., and its attorney, William F. Carr, for copying all said documents.

This subpoena is issued on application of Enserch Exploration, Inc. through its attorneys, Campbell, Carr & Berge, P.A., Post Office Box 2208, Santa Fe, New Mexico 87504.

ISSUED THIS 11th day of July, 1995 at Santa Fe, New Mexico.

NEW MEXICO OIL CONSERVATION
DIVISION

By:

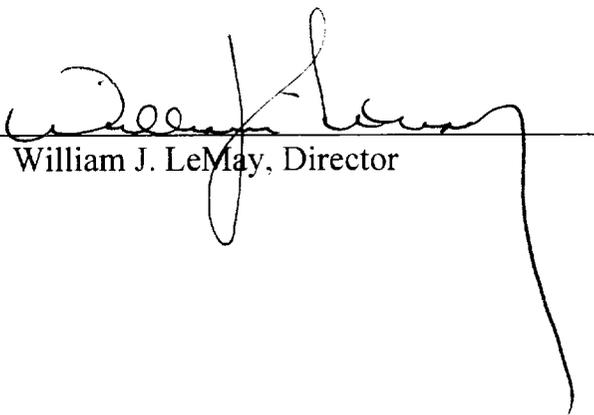

William J. LeMay, Director

EXHIBIT "A"
TO SUBPOENA DUCES TECUM
TO PHILLIPS PETROLEUM COMPANY
IN NEW MEXICO OIL CONSERVATION DIVISION
CASE 11334

PURPOSE: The purpose of this subpoena is to provide all of the information necessary for Enserch Exploration, Inc. to be able to adequately prepare its opposition to Phillips Petroleum Company in NMOCD Case 11334.

I. PRODUCE THE FOLLOWING DOCUMENTS:

1. All "new data" referred to in paragraph 7 of Phillips Petroleum Company's application in Case 11334 obtained by Phillips Petroleum Company, subsequent to the New Mexico Oil Conservation Commission hearing on February 23, 1995 in Case 10994 (De Novo) upon which engineering studies have been conducted which justify Phillips Petroleum Company's application in Case 11334.
2. Any engineering studies which have been conducted utilizing the "new data" referred to in paragraph 7 of Phillips Petroleum Company's application in Case 11334.
3. If Phillips Petroleum Company has conducted any reservoir simulation as part of any engineering study referred to in paragraph 7 of its application in this case, then provide: model software description, model parameters and assumptions, model variables, model history matching data, model predictions, subsequent modification.
4. Any petroleum engineering data used or to be used by Phillips Petroleum Company to justify its application in Case 11334 including all pressure data, including but not limited to bottomhole pressure surveys, daily tubing pressure and casing pressure surveys, with relevant information as to shut-in time and production rate prior to shut-in.
5. 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).
6. Any and all reservoir studies, including but not limited to drainage calculations, well interference studies, pressure studies or well communication studies.
7. Any geologic data including geologic maps, structure maps, isopachs, cross-sections, and/or logs being used by Phillips Petroleum Company to justify its application in

Case 11334.

8. Any and all geologic and/or engineering studies and interpretations by which Phillips Petroleum Company justifies and evaluates its application in Case 11334.

9. If not otherwise produced for any above number request, then any and all geologic and petroleum engineering data, reports, conclusions and summaries Phillips Petroleum Company has conducted in its efforts to support its application in Case 11334.

AND PRODUCE:

1. Copies of any possible geologic exhibits for use by Phillips Petroleum Company at the subject hearing;

2. Copies of any possible engineering exhibits for use by Phillips Petroleum Company at the subject hearing;

3. Copies of any possible land exhibits for use by Phillips Petroleum Company at the subject hearing; and

4. Copies of any other exhibits which you could use at the hearing.

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, 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.

When used herein, "you" or "your" refers to the person or entity to whom this Subpoena Duces Tecum is addressed to include all of his or its attorneys, officers, agents, employees, directors or representatives, officials, departments, divisions, sub-divisions, 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 Phillips Petroleum Company, whether prepared by you or otherwise, which is in your possession or control or known by you to

SUBPOENA DUCES TECUM,

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exist, including but not limited to all drafts, papers, books, writing, 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.