

GALLEGOS LAW FIRM

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June 30, 1997
(Our File 97-20.1)

JASON E. DOUGHTY*

VIA HAND DELIVERY

William J. LeMay
Director
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

RE: NMOCD Cases 11808 and 11809
Application of Burlington Resources Oil & Gas Co. for compulsory pooling,
Sections 8 and 9, T31N-R10W, NMPM San Juan County, New Mexico

Dear Mr. LeMay:

I am informed by Ms. Florene Davidson that you have not yet received the Subpoena Duces Tecum we filed on Friday, June 27, 1997. As such, on behalf of Timothy B. Johnson, Trustee for Ralph A. Bard, Jr. Trust U/A/D February 12, 1983 et al., affected working interest owners, enclosed please find another copy our Subpoena Duces Tecum requesting that Burlington Resources Oil & Gas Company produce certain documents necessary for our clients to oppose the referenced applications.

Very truly yours,

GALLEGOS LAW FIRM, P.C.

By: 

JASON E. DOUGHTY

cfx: W. Thomas Kellahin, Attorney for Burlington Resources Oil & Gas Co. via fax

**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. 11808
CASE NO. 11809**

**RE: APPLICATION OF BURLINGTON RESOURCES
OIL AND GAS COMPANY FOR COMPULSORY
POOLING AND A NON-STANDARD PRORATION
AND SPACING UNIT, SECTIONS 8 AND 9, T31N-
R10W, NMPM, SAN JUAN COUNTY, NEW MEXICO**

SUBPOENA DUCES TECUM

**TO: Burlington Resources Oil and Gas Co.
c/o W. Thomas Kellahin
Kellahin & Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504-2265**

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 8, 1997, 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 the attached Exhibit A and to make available to the Applicants and their attorneys, J.E. Gallegos and Jason E. Doughty, for copying, all of said documents.

This subpoena is issued on application of Lee Wayne Moore and Joann Montgomery Moore, Trustees and Timothy B. Johnson, Trustee for Ralph A. Bard, Jr. Trust U/A/D February 12, 1983 et al. (all applicants are identified on Exhibit A hereto)

through their attorneys, Gallegos Law Firm, 460 St. Michael's Drive, Building 300, Santa Fe, New Mexico 87505.

Dated this 1st day of ^{July}~~June~~, 1997.

NEW MEXICO OIL CONSERVATION DIVISION

By:


WILLIAM J. LEMAY, DIRECTOR

EXHIBIT "A"

PURPOSE: The purpose of this subpoena is to provide all of the information necessary for the Applicants to be able to prepare their opposition to Burlington Resources Oil & Gas Company in NMOCD Cases 11808 and 11809.

DEFINITIONS

Certain terms used in these requests are defined as follows:

A. "Concerning" includes referring to, alluding, responding to, relating to, connected with, commenting on, in reference of, about, regarding, documenting, discussing, showing, describing, mentioning, reflecting, analyzing, constituting, evidencing, or pertaining to.

B. "Document(s)" has the meaning as in SCRA 1986, 1-034 including, inter alia, all written, printed, typed, recorded, pictorial, representational or graphic matter, photographic matter, sound reproductions, computer files, electronic media, tapes, inputs or outputs, however produced or reproduced, or any other matter from which information may be obtained, and drafts and non-identical duplicates or copies thereof and shall further include, but is not limited to, any code, key or other information or material necessary to an understanding of such documents or the information contained therein.

C. "Reflecting" means to show, portray, demonstrate or provide the requested information and, where more than one document is responsive, such term requests only those documents that best and most completely show the information sought.

F. "Burlington" means Burlington Resources Oil and Gas Co. and includes predecessors, the same corporation under some other name, its parent corporation and/or predecessors, the same corporation under some other name, its parent corporation and/or

corporations merged or consolidated into it; and its present or former officers, directors, agents, employees and all other persons acting or purporting to act on its behalf or on behalf of its predecessors, subsidiaries, and/or affiliated companies.

REQUESTS

REQUEST NO. 1 Any and all information and/or documents concerning Burlington's proposed location and drilling of the Marcotte Well No. 2 in the southeast quarter of Section 8, T31N, R10W, San Juan County, New Mexico, to include without limitation:

A. any and all documents and/or studies reflecting the engineering justification (drilling, reservoir and/or production) concerning Burlington's choice of this particular well location and Burlington's decision to test the deep Pennsylvanian formation;

B. any and all documents and/or studies reflecting the geologic justification concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation; to include without limitation, any stratigraphic cross sections, geologic cross sections, annotated individual logs, isopach maps, isopleth maps, mud logs, sample (well cutting) logs, conceptual cross sections and block/perspective diagrams, net pay maps, gross pay maps, photogeologic maps, fracture, linear and lineament maps from ariel photographs or other remotely sensed imagery, source rock studies, thermal maturation and/or geohistory studies/models and surface geochemistry studies.

C. any and all documents and/or studies reflecting the geophysical justification concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation; to include without limitation potential field studies (gravity and/or

magnetic), natural and induced electrical current studies, and seismic studies and studies establishing present-day principle horizontal stress.

D. any and all documents and/or studies reflecting the topographical justification concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation to include without limitation cultural and/or archeological considerations, threatened and endangered species, and other surface or subsurface considerations.

E. any and all documents reflecting two dimensional and/or three dimensional seismic information concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation;

F. any and all documents reflecting the interpretation of two dimensional and/or three dimensional seismic information concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation to include without limitation structure maps, isopach/isopleth maps, interpreted cross sections, and displays of seismic "slices" from three-dimensional data cubes;

G. any and all computerized databases reflecting two dimensional and/or three dimensional seismic information concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation to include without limitation digital/computerized seismic data in a format suitable for use in a current industry standard geophysical workstation;

H. any and all documents concerning Burlington's current and potential future working interest ownership in formations underlying the Dakota Formation in Section 8, T31N, R10W, San Juan County, New Mexico, to include without limitation, any farmout or

drilling agreements or like agreements reflecting the right to drill and/or operate the Marcotte Well No. 2, entered into by Burlington with other working interest owners in Section 8, T31N, R10W, San Juan County, New Mexico;

I. All sources, bids, contracts and like documents reflecting the estimated costs as indicated on Burlington's Well Cost Estimate and/or Authorization For Expenditure for the proposed Marcotte Well No. 2; and

J. Any and all documents or data concerning the porosity and/or permeability of formations below the base of the Dakota formation to the top of the Pre-Cambrian aged formation underlying Section 8, T31N, R10W, San Juan County, New Mexico to include without limitation the position of the proposed well over the fault at the top of the Pre-Cambrian basement, any and all analyses of the current in situ reservoir permeability and poro.

K. any and all documents reflecting information from test wells located in the Northern San Juan Basin and/or the Four Corners Platform areas (to include the Barker Dome, Ute Dome and Alkali Gulch fields) which have been used by Burlington to infer and/or extrapolate information concerning the San Juan Basin Deep Pennsylvanian formation, to include, without limitation, thermal modeling studies, geohistory/burial history models or studies, information on reservoir drive mechanism, and reservoir fluids expected to be encountered (e.g. gas over oil over water; gas over water, gas only, H₂S, and CO₂ as significant quantities in methane).

REQUEST NO. 2 Any and all information and/or documents concerning Burlington's proposed location and drilling of the Scott Well No. 24 in the northwest quarter of Section 9, T31N, R10W, San Juan County, New Mexico, to include without limitation:

A. any and all documents and/or studies reflecting the engineering (drilling, reservoir and/or production) justification concerning Burlington's choice of this particular well location and Burlington's decision to test the deep Pennsylvanian formation;

B. any and all documents and/or studies reflecting the geologic justification concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation; to include without limitation, any stratigraphic cross sections, geologic cross sections, annotated individual logs, isopach maps, isopleth maps, mud logs, sample (well cutting) logs, conceptual cross sections and block/perspective diagrams, net pay maps, gross pay maps, photogeologic maps, fracture, linear and lineament maps from ariel photographs or other remotely sensed imagery, source rock studies, thermal maturation and/or geohistory studies/models and surface geochemistry studies.

C. any and all documents and/or studies reflecting the geophysical justification concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation; to include without limitation potential field studies (gravity and/or magnetic), natural and induced electrical current studies, and seismic studies and studies establishing present-day principle horizontal stress.

D. any and all documents and/or studies reflecting the topographical justification concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation to include without limitation cultural and/or archeological considerations, threatened and endangered species considerations, and other surface or subsurface considerations.

E. any and all documents reflecting two dimensional and/or three dimensional seismic information concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation;

F. any and all documents reflecting the interpretation of two dimensional and/or three dimensional seismic information concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation to include without limitation structure maps, isopach/isopleth maps, interpreted cross sections, and displays of seismic "slices" from three-dimensional data cubes;

G. any and all computerized databases reflecting two dimensional and/or three dimensional seismic information concerning Burlington's choice of this particular well location to test the deep Pennsylvanian formation to include without limitation digital/computerized seismic data in a format suitable for use in a current industry standard geophysical workstation;

H. any and all documents concerning Burlington's current and potential future working interest ownership in formations underlying the Dakota Formation in Section 9, T31N, R10W, San Juan County, New Mexico, to include without limitation, any farmout or drilling agreements or like agreements reflecting the right to drill and/or operate the Scott Well No. 24, entered into by Burlington with other working interest owners in Section 9, T31N, R10W, San Juan County, New Mexico;

I. All sources, bids, contracts and like documents reflecting the estimated costs as indicated on Burlington's Well Cost Estimate and/or Authorization For Expenditure for the proposed Scott Well No. 24; and

J. Any and all documents or data concerning the porosity and/or permeability of formations below the base of the Dakota formation to the top of the Pre-Cambrian aged formation underlying Section 9, T31N, R10W, San Juan County, New Mexico to include without limitation the position of the proposed well over the fault at the top of the Pre-Cambrian basement, any and all analyses of the current in situ reservoir permeability and poro.

K. any and all documents reflecting information from test wells located in the Northern San Juan Basin and/or the Four Corners Platform areas (to include the Barker Dome, Ute Dome and Alkali Gulch fields) which have been used by Burlington to infer and/or extrapolate information concerning the San Juan Basin Deep Pennsylvanian formation, to include, without limitation, thermal modeling studies, geohistory/burial history models or studies, information on reservoir drive mechanism, and reservoir fluids expected to be encountered (e.g. gas over oil over water, gas over water, gas only, H₂S, and CO₂ as significant quantities in methane).

REQUEST NO. 3 Any permits, licenses, contracts, agreements, authorizations and/or other documents concerning Burlington's right and/or authority to undertake geophysical surveys on Sections 8 and/or 9, T31N, R10W, San Juan County, New Mexico.

REQUEST NO. 4 Any plats, shot point and other maps, diagrams or like documents reflecting the location where either two dimensional and/or three dimensional geophysical surveys on Sections 8 and/or 9, T31N, R10W, San Juan County, New Mexico were undertaken.