

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

**APPLICATION OF CHESAPEAKE OPERATING INC.
FOR AN UNORTHODOX OIL WELL LOCATION,
LEA COUNTY, NEW MEXICO.**

**Case No. 11844
(De Novo)**

SUBPOENA DUCES TECUM

TO: Chesapeake Operating Inc.
c/o James Bruce, Esq.
612 Old Santa Fe Trail
Suite B
Santa Fe, NM 87501

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., November 20 , 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 attached Exhibit A and to make available to Marathon Oil Company and its attorney, William F. Carr, for copying, all of said documents.

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

EXHIBIT "A"

**TO SUBPOENA DUCES TECUM
TO CHESAPEAKE OPERATING INC.
IN NEW MEXICO OIL CONSERVATION DIVISION
CASE 11844 (De Novo)**

PURPOSE: The purpose of this subpoena is to provide all of the information necessary for Marathon Oil Company to be able to prepare its opposition to Chesapeake Operating Inc. in NMOCD Case 11844, (*De Novo*).

I. PRODUCE THE FOLLOWING:

Four arbitrary seismic lines, showing the Strawn interval, extracted from Chesapeake's 3-D seismic data set centered on the Chesapeake Operating Inc. proposed unorthodox well location for its Gandy "19" Well No. 1, 2,523 feet from the North line and 2370 feet from the East line (Unit G) of Section 19, Township 16 South, Range 36 East, NMPM, Lea County, New Mexico, and extending one mile in each direction from the proposed location, as follows:

- (1) N 30° E - S 30° W
- (2) N 30° W - S 30° E
- (3) N 60° W - S 60° E
- (4) East - West

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, agents, consultants, employees, directors, representatives, officials, departments, divisions, subdivisions, subsidiaries, or predecessors.