

**KELLAHIN AND KELLAHIN**

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

W. THOMAS KELLAHIN\*

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION  
RECOGNIZED SPECIALIST IN THE AREA OF  
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

TELEPHONE (505) 982-4285  
TELEFAX (505) 982-2047

September 10, 1998

**HAND DELIVERED**

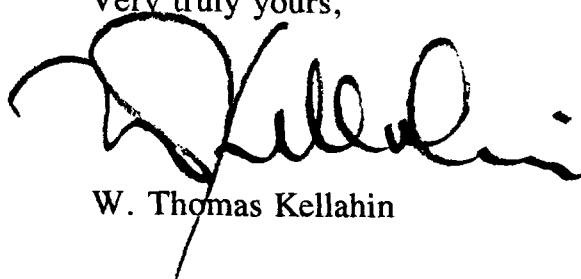
Ms. Lori Wrotenbery, Director  
Oil Conservation Division  
2040 South Pacheco  
Santa Fe, New Mexico 87505

Re: Subpoena Duces Tecum  
NMOCD Case 12037  
Application of Yates Petroleum Corporation

Dear Ms Wrotenbery:

On behalf of Chesapeake Operating, Inc., I am delivering to you for signature the original of a subpoena which we would appreciate being issued today. Please have Florene call me when it is ready and I will pick it up.

Very truly yours,



W. Thomas Kellahin

cfx: Chesapeake Operating, Inc.  
Attn: Robert Hefner

OIL CONSERVATION DIV.  
98 SEP 10 PM 2:22

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

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

**APPLICATION OF YATES PETROLEUM CORPORATION CASE NO. 12037  
FOR SIMULTANEOUS DEDICATION, OR IN THE  
ALTERNATIVE, FOR SPECIAL POOL RULES,  
LEA COUNTY, NEW MEXICO**

OIL CONSERVATION DIV.  
98 SEP 10 PM 2:22

**SUBPOENA DUCES TECUM**

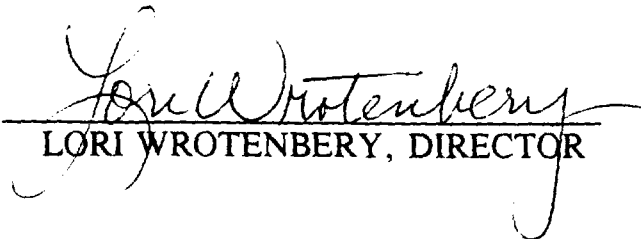
**TO: YATES PETROLEUM CORPORATION  
c/o William F. Carr, Esq.  
Campbell, Carr, Berge & Sheridan  
P. O. Box 2208  
Santa Fe, New Mexico, 87504-2208**

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., September 17, 1998, 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 Chesapeake Operating, Inc. and their attorney, W. Thomas Kellahin, for copying, all of said documents.

This subpoena is issued on application of Chesapeake Operating, Inc. through their attorneys, Kellahin & Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

Dated this 10<sup>th</sup> day of <sup>September</sup>~~October~~, 1998.

NEW MEXICO OIL CONSERVATION DIVISION

BY:   
LORI WROTENBERY, DIRECTOR

# **EXHIBIT "A"**

## **TO SUBPOENA DUCES TECUM TO YATES PETROLEUM CORPORATION IN NEW MEXICO OIL CONSERVATION DIVISION CASE 12037**

**PURPOSE:** The purpose of this subpoena is to provide all of the information necessary for Chesapeake Operating Inc. to be able prepare its opposition to Yates Petroleum Corporation in Case 12037

### **THE DATA TO BE PRODUCED INVOLVES THE ATOKA AND MORROW FORMATIONS**

#### **I. PRODUCE THE FOLLOWING DOCUMENTS:**

for EACH AND ALL of the following wells in T16S, R35E, Lea County, New Mexico:

##### **A. WELLS:**

- (1) Shell Lusk Well  
drilled in Unit F of Section 11,
- (2) Brunson "AQK" Well No. 1,  
drilled in Unit G of Section 10,
- (3) Big Flat "ASN" State Com Well No. 1,  
drilled in Unit J of Section 10,
- (4) Carlisle Well No. 1  
drilled in Unit K of Section 10,
- (5) Carlisle Well No. 1-Y  
drilled in Unit K of Section 10,
- (6) Runnels "ASP" Well No. 2  
drilled in Unit J of Section 11,

##### **B. DOCUMENTS:**

1. Mudlogs
2. Openhole logs, including but not limited to density/neutron porosity, resistivity and sonic logs

3. Reservoir temperature data

4. Reservoir pressure data, **by individual zone (perforation)** including but not limited to bottom-hole surveys or pressures, surface pressure readings, daily tubing pressure and casing pressures, drill stem tests, build-up tests and interference tests, with relevant information as to shut-in time and production rates prior to shut-in.

5. all production data including, but not limited to all well check records, including gauges/charts for each well on a daily basis from initial testing/completion to date showing actual production of oil, gas and water for said well per day and per month.

6. Chronological reports to include details of:

- a. perforating and perforation locations
- b. stimulation fluids, volumes, rates, and pressures for each treated interval
- c. Swabbing, flowing and/or pumping results for each interval that was perforated and tested including Pre and Post stimulation results as applicable.

7. If your client has conducted any reservoir simulation which includes any of the subject wells, then provide: model software description, model parameters and assumptions, model variables, model history matching data, model predictions, subsequent modification.

8. Any petroleum engineering data used or to be used by Yates to justify its position in NMOCD Case 12037 including all pressure data, including but not limited to bottom hole pressure surveys, daily tubing pressure and casing pressure surveys, with relevant information as to shut-in time and production rate prior to shut-in;

9. 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);

10. Any and all reservoir studies, including but not limited to drainage calculations, well interference studies, pressure studies or well communication studies;

11. Any and all documents and data concerning "workover" actually conducted, attempted or contemplated;

12. Any geologic data including geologic maps, structure maps, ispoachs, cross-sections, and/or logs being used by Yates to justify its position;

### **C. SEISMIC DATA:**

- (1) vertical seismic profile line (north-south trace through and extending one mile in each direction from the Big Flat well location)
- (2) vertical seismic profile line (east-west line through and extending one mile in each direction from the Big Flat well location)
- (3) a vertical seismic profile line (north-south) through and extending one mile in each direction from each of the six well locations described above
- (4) a vertical seismic profile trace (east-west) through and extending one mile in each direction from each of the six well locations described above
- (7) Yates' conversion of the atoka top time structure into a structure map showing actual depths

### **II PRODUCE THE FOLLOWING ADDITIONAL DATA:**

- (1) any and all information concerning the acquisition, processing and interpretation of the 3-D seismic data;
- (2) copies of the geophysical interpreter's report, including all maps and input data;
- (2) predesign of the 3-D survey including the resolution, bin size, number of bins, number of pre and poststack traces;
- (3) identify and describe the seismic calculation (computer) program used;
- (4) any and all seismic profiles and time sections;
- (5) list of all ties and mis-ties to well data;
- (6) any velocity maps, including isochron or velocity converted depth maps;
- (7) details on digitisation of maps, including a detailed description of the software package for reduction of the digitized data;
- (8) details, including any adjustment of parameters for map construction including depth conversion; and
- (9) copies of any and all maps including initial and final isopach contour maps of structure and any "isometric displays" or presentations.

### III. Yates' Hearing Exhibits:

- (1) copies of any geologic data and exhibits including geologic maps, structure maps, ispoachs, cross-sections, and/or logs to be used by Yates Petroleum Corporation
- (2) copies of any and all geophysical data/studies and exhibits to be used by Yates Petroleum Corporation
- (3) copies of any and all petroleum engineering data/studies and exhibits to be used by Yates Petroleum Corporation

## **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 Thompson Engineering & Production Company, 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.