

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

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**APPLICATION OF CHESAPEAKE OPERATING,  
INC., FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 12186**

**SUBPOENA DUCES TECUM**

TO: Chesapeake Operating, Inc.  
c/o W. Thomas Kellahin, Esq.  
Kellahin & Kellahin  
117 North Guadalupe Street  
Santa Fe, NM 87501

OIL CONSERVATION DIV.  
99 MAY 18 AM 8:31

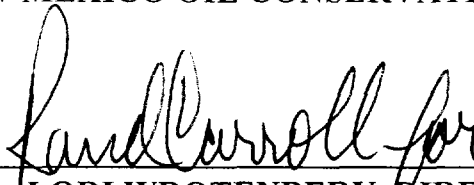
Pursuant to Section 70-2-8, NMSA (1978) and Rule 1211 of the New Mexico Oil Conservation Division's Rules of Procedure, you are hereby ORDERED to appear at 8:15 a.m., May 27, 1999 at the offices of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505 and to produce the documents and items specified in attached Exhibit A and to make available to Ameristate Oil & Gas, Inc., and their attorney, William F. Carr, for copying, all of said documents.

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

Dated this \_\_\_\_\_ day of May, 1999.

**NEW MEXICO OIL CONSERVATION DIVISION**

BY:

  
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**LORI WROTENBERY, DIRECTOR**

## **EXHIBIT "A"**

### **TO SUBPOENA DUCES TECUM TO CHESAPEAKE OPERATING, INC. IN NEW MEXICO OIL CONSERVATION DIVISION CASE 12186**

**PURPOSE:** The purpose of this subpoena is to provide all of the information necessary for Ameristate Oil & Gas, Inc., to be able to prepare its opposition to Chesapeake Operating, Inc., in NMOCD Case 12186.

#### **PRODUCE THE FOLLOWING DOCUMENTS :**

1. If your client has conducted any reservoir simulation which includes the E/2 of Section 15, Township 16 South, Range 35 East, NMPM, then provide: model software description, model parameters and assumptions, model variables, model history matching data, model predications, subsequent modifications.
2. Any petroleum engineering data used or to be used by Chesapeake to justify the location of its proposed Boyce "15" Well No. 1.
3. Any geologic data including geologic maps, structure maps, isopach maps, cross sections and/or logs being used by Chesapeake to justify the location for its proposed Boyce "15" Well No. 1.
4. Any seismic data used by Chesapeake to justify the location for its proposed Boyce "15" Well No. 1 including but not necessarily limited to:
  - A. Vertical seismic profile line (north-south trace through and extending one mile in each direction from the proposed well location),
  - B. Vertical seismic profile line (east-west line through and extending one mile in each direction from the proposed well location),
  - C. Chesapeake's conversion of this seismic information into a structure map showing actual depths.
5. Produce the following additional data:
  - A. Any and all information concerning the acquisition, processing and interpretation of the 3-D seismic data;

- B. copies of the geophysical interpreter's report, including all maps and input data;
  - C. predesign of the 3-D survey including the resolution, bin size, number of bins, number of pre and poststack tracts;
  - D. identify and describe the seismic calculations (computer) program used;
  - E. any and all seismic profiles and time seconds;
  - F. lists of all ties and mis-ties to well data;
  - G. any velocity maps, including isochron of velocity converted depth maps;
  - H. details on digitization of maps, including a detailed description of the software package for reduction of the digitized data;
  - I. details, including any adjustments of parameters for map construction including depth conversion: and
  - J. copies of any and all maps including initial and final isopach contour maps of structure and any "isometric displays" or presentations.
6. Produce Chesapeake's Hearing Exhibits:
- A. copies of any geologic data and exhibits including geologic maps, structure maps, isopach maps, cross-sections, and/or logs to be used by Chesapeake Operating Inc.
  - B. copies of any and all geophysical data/studies and exhibits to be used by Chesapeake Operating Inc.
  - C. copies of any and all petroleum engineering data/studies and exhibits to be used by Chesapeake Operating Inc.

## 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.

The term "document" as used herein means every writing and record of every type and description in the possession, custody or control of Chesapeake Operating, Inc., 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.