## EXHIBIT A

## TO SUBPOENA DUCES TECUM TO SDX RESOURCES INC. IN NEW MEXICO OIL CONSERVATION DIVISION CASE NO. 12015

## DEFINITIONS AND INSTRUCTIONS

 For purposes of this Exhibit "A", the "Subject Wells," all located in Lea County, New Mexico, are identified as follows:

E.J. Wells Well No. 25	N/2 SW/4 and SW/4 SW/4, Section 5, T-25-S, R-37-E, Lea County, NM
E.J. Wells Well No. 13	N/2 SW/4 and SW/4 SW/4, Section 5, T-25-S, R-37-E, Lea County, NM
E.J. Wells Well No. 16	N/2 SW/4 and SW/4 SW/4, Section 5, T-25-S, R-37-E, Lea County, NM
Jalmat Federal Com. Well No. 2	Section 31, T-24-S, R-37-E, Lea County, NM
Jalmat Federal Com. Well No. 1	Section 31, T-24-S, R-37-E, Lea County, NM
State A 32 No. 4 Unit F State A 32 No. 5 Unit D	G.P.U. NW/4 NW/4 and S/2 NW/4 Sec. 32, T24-S, R-37-E, 120 Acres
Langlie A Federal #1 Unit J Langlie A Federal # 2 Unit O	G.P.U. SE/4 Sec. 17, T-25-S, R-37-E, 160 Acres
Langlie Jal Federal No. 1 Unit A Langlie Jal Federal No. 2 Unit G	G.P.U. NE/4 Sec. 8, T-25-S, R-37-E, 160 Acres
Wells Federal No. 1, Unit I Wells Federal No. 17, Unit J Wells Federal No. 20, Unit P	G.P.U. SE/4 and SE/4 SW/4 Sec. 5, T-25-S, R-37-E, 200 Acres
State A-32 No. 4, Unit F State A-32 No. 5, Unit D State A-32 No. 6, Unit E	G.P.U. W/2 NW/4, SE/4 NW/4 Sec. 32, T-24-S, R-37-E, 120 Acres

Wells Federal No. 4, Unit F Wells Federal No. 5, Unit D Wells Federal No. 22, Unit C Wells Federal No. 23, Unit E G.P.U. NW/4, Sec. 5, T-25-S, R-37-E, 160 Acres

- 2. For each of the Subject Wells, all of the following materials, documents or data:
  - A. The complete well file;
  - B. All notices provided to the New Mexico Oil Conservation Division or the United States Bureau of Land Management;
  - C. Documents describing the drilling program for the subject wells, including approvals, schedules, timetables, contracts for drilling, correspondence, etc.
  - D. Documents describing how the subject wells were staked;
  - E. Documents evidencing SDX's efforts to comply with NMOCD rules and regulations in connection with the subject wells.
- 3. All reserve, drainage area, deliverability, volumetric or other such studies and documents relating to or supporting infill drilling programs you have adopted, recommended or implemented for gas wells in the Jalmat Gas Pool.
- 4. All documents, whether generated by you or an independent consulting engineering firm, that relate in any way to the comprehensive evaluation of your Jalmat drilling project referenced in your letter of November 16, 1999 to Doyle Hartman. A copy of that letter is attached.
- 5. All documents, including but not limited to reserve projections, corresponding pressure data, geological studies, and production data which you contend support your request for unorthodox location and/or simultaneous dedication

8

whereby more than one well occupies a gas proration unit in the Jalmat Gas Pool.

- 6. All documents, including but not limited to (a) land files, (b) transfers of interest, assignments of interest, and Assignments and Bill of Sale in the subject wells, or of acreage on which the subject wells are located, from or to SDX and any other party, (c) transfers of interest, assignments of interest, and Assignments and Bill of Sale in the subject wells, or of acreage on which the subject wells are located, from SDX and any other party, (d) lists of interest owners in the acreage comprising proration units for the subject wells, and (e) all communications to or from SDX related to any transfer of interest and the administrative applications for the subject wells.
- 7. All documents referencing any communication between you and the New Mexico Oil Conservation Division, its Director, hearing officers, agents, and employees, including but not limited to meeting notes, expense account statements, telephone message slips, memoranda, correspondence, regarding the Subject Wells and/or your infill drilling program for the Jalmat Gas Pool in Lea County, New Mexico.

Respectfully submitted,

AW FIRM, P.G GALLEG By

J.E. GALLEGOS MICHAEL J. CONDON 460 St. Michael's Drive, Bldg. 300 Santa Fe, New Mexico 87505 (505) 983-6686