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

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

CASE NO. 12622 (DE NOVO) 📆

APPLICATION OF NEARBURG EXPLORATION COMPANY, L.L.C. FOR TWO NON-STANDARD GAS SPACING AND PRORATION UNITS, LEA COUNTY, NEW MEXICO

**CASE NO. 12980** 

APPLICATION OF THE OIL CONSERVATION DIVISION FOR AN ORDER CREATING AND EXTENDING CERTAIN POOLS, LEA COUNTY, NEW MEXICO

## **OBJECTIONS TO SUBPOENA DUCES TECUM**

Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline, LLC, ("Raptor"), hereby objects to the September 13, 2002 Subpoena Duces Tecum issued to Redrock Operating Ltd., Co. at the request of Nearburg Exploration Company, L.L.C.

Raptor objects to the subpoena to the extent it seeks the production of confidential or proprietary business information, material or other data belonging to it or LG&E Natural Pipeline, LLC. Raptor further objects to the extent the subpoena seeks information or materials protected by the attorney-client communication or attorney work-product privileges. Raptor asserts these objections and privileges for any information or materials that may be in the possession of any third party.

## Respectfully submitted

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## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing pleading was hand-delivered or faxed as indicated this 18th day of September 2002, as follows:

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