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June 7, 2001

**HAND DELIVERED**

Ms. Lori Wrotenbery, Director  
Oil Conservation Division  
New Mexico Energy, Minerals and  
Natural Resources Department  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87504

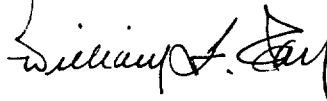
***Re: Case No. 12622: Application of Nearburg Exploration  
Company, L.L.C. for approval of two non-standard 160-acre  
gas spacing and proration units, Lea County, New Mexico.  
Subpoena Duces Tecum to Redrock Operating Ltd. Company  
et al from Nearburg Exploration Company, L.L.C.***

Dear Ms. Wrotenbery:

Enclosed is a Subpoena Duces Tecum filed on behalf of Nearburg Exploration Company, L.L.C., to Redrock Operating, Ltd. Please sign and return to me for service on W. Thomas Kellahin, attorney for Redrock Operating, Ltd.

Thank you for your assistance.

Very truly yours,



William F. Carr

Enc.

cc: Bob Shelton

CLERK  
JUN 7 2001  
10:03 AM

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

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

**CASE NO. 12662**

**SUBPOENA DUCES TECUM**

TO: Redrock Operating Ltd., Co.  
Tim Cashon and Mark Stanger  
c/o W. Thomas Kellahin, Esq.  
Kellahin and Kellahin  
117 North Guadalupe  
Santa Fe, New Mexico 87501

01 JUN -7 PM 9:35  
OIL CONSERVATION DIV

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., June 14, 2001, at the offices of the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87504, and to produce the documents and items specified in attached Exhibit A and to make available to Nearburg Exploration Company, L.L.C., and their attorney, William F. Carr, for copying, all of said documents.

This subpoena is issued on application of Nearburg Exploration Company, L.L.C., through their attorneys, Holland & Hart LLC and Campbell & Carr, Post Office Box 2208, Santa Fe, New Mexico 87504.

Dated this \_\_\_\_ day of June, 2001

**NEW MEXICO OIL CONSERVATION DIVISION**

**BY:** *David K. Brooks*  
*assistant General Counsel*  
**LORI WROTENBERY, DIRECTOR**

**EXHIBIT "A"**

**TO SUBPOENA DUCES TECUM  
TO REDROCK OPERATING LTD. CO., TIM CASHON AND MARK STANGER  
IN NEW MEXICO OIL CONSERVATION DIVISION  
CASE 12622**

PURPOSE: The purpose of this subpoena is to provide all of the information necessary for Nearburg Exploration Company, L.L.C. to be able to prepare its for New Mexico Oil Conservation Division Case 12622.

**PRODUCE THE FOLLOWING DOCUMENTS:**

for each and all of the following wells in Section 34, Township 12 South, Range 34 East, NMPM, Lea County, New Mexico:

Nearburg Producing Company, L.L.C.'s Grama Ridge East "34" State Well No. 1 drilled in Unit H

Pecos River Operating, Inc. and/or EOG Resources, Inc.'s Llano "34" State Well No. 1 drilled in Unit I

Grama Ridge Morrow Unit Well No. 2 drilled in Unit L

**Documents:**

1. Electric Log data
2. Drilling Time data
3. Completion data
4. Gas Analysis
5. Water Analysis
6. Fluid data
7. Reservoir Performance
8. Geologic data
9. Well Performance data
10. Permeability data
11. Porosity data
12. Reservoir thickness data
13. Pressure data
14. Gas Content data
15. Pressure v. time plots
16. Production decline curves

17. Initial Water/Gas Saturation data.

**IF NOT ALREADY INCLUDED ABOVE, THE FOLLOWING ADDITIONAL DATA:**

1. All documents between Redrock Operating Ltd. Co., Tim Cashon and/or Mark Stanger and your predecessors in interest concerning this acreage, the ownership thereof and the wells located thereon;
2. Openhole logs, including but not limited to density/neutron porosity, resistivity and sonic logs;
3. PVT 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 include Pre and Post stimulation results as applicable; and
  - d. Daily drilling and completion reports;
7. If you have 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 you to justify your position in NMOCD Case No. 12622 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; and
12. Any geologic data including geologic maps, structure maps, isopachs, cross-sections, and/or logs being used by you to justify your position.

**Seismic 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;
3. Predesign of the 3-D survey including the resolution, bin size, number of bins, number of pre and poststack tracs;
4. Identify and describe the seismic calculation (computer) program used;
5. Any and all seismic profiles and time sections;
6. List of all ties and mis-ties to well data;
7. Any velocity maps, including isochron or velocity converted depth maps;
8. Details on digitization of maps, including a detailed description of the software package for reduction of the digitized data;
9. Copies of any and all maps including initial and final isopach contour maps of structure and any “isometric displays” or presentations.

**Correspondence/Communications/Accounting/Land Files:**

1. Any and all contracts, communitization agreements, joint operating agreements, leases, assignments, correspondence, and farmout agreements that apply to any of the subject wells;
2. A detailed accounting of all production, expenses, revenues and payments for any of the subject wells;
3. All land files;
4. All documents between you and Office of Commissioner of Public Lands for New Mexico;
5. All documents between you and EOG Resources Inc.
6. All documents between you and Oil Conservation Division located in Santa Fe, New Mexico;
7. All documents between you and Oil Conservation Division located in Hobbs, New Mexico;
8. All documents between you and LG&E Natural Gas Pipeline LLC;
9. All documents between you and Raptor Natural Pipeline, L.L.C., f/k/a LG&E Energy Corporation.

**Hearing Exhibits:**

1. Copies of all land exhibits and ownership data and exhibits to be used by you;
2. Copies of any geologic data and exhibits including geologic maps, structure maps, isopachs, cross-sections, and/or logs to be used by you;
3. Copies of any and all geophysical data/studies and exhibits to be used by you; and
4. Copies of any and all petroleum engineering data/studies and exhibits to be used by you.

## **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 persons and 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 in interest.

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



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

**APPLICATION NEARBURG EXPLORATION  
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**CASE NO. 12662**

**ACCEPTANCE OF SERVICE OF SUBPOENA DUCES TECUM**

I, W. Thomas Kellahin, Esq., the attorney of record for Redrock Operating, Ltd., hereby accept service of the original Subpoena Duces Tecum dated June 7, 2001, issued in this matter to Redrock Operating, Ltd., Inc. on this \_\_\_\_ day of June, 2001.

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W. Thomas Kellahin, Esq.  
Kellahin and Kellahin  
117 North Guadalupe  
Santa Fe, New Mexico 87501