

C

-

EXHIBIT A

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

DEFINITIONS AND INSTRUCTIONS

1. For purposes of this Exhibit "A", the "Subject Wells" are identified as follows:

All existing and proposed wells operated by Raptor Resources, Inc. situate in Section 8 and Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico.
2. For each of the Subject Wells, all of the following materials, documents or data:
 - A. The complete well file, including but not limited to all C-102 and C-104 forms naming you, and well logs.
 - B. All documents provided to the New Mexico Oil Conservation Division ("NMOCD") 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, and correspondence
 - D. Documents constituting or referring to engineering or geological evaluation concerning existing wells or the developing of additional wells.
 - E. Authorities for Expenditures and final compilations or statements of costs to complete all Subject Wells developed by you as operator.
3. Documents reflecting the negotiations and transactions leading to and resulting in ownership by Dervish Energy LLC and Orr Holding Ltd., of interests in the leases underlying the Subject Wells.

4. All documents relating to or supporting infill drilling programs recompletions or reworks you have adopted, recommended or implemented for gas wells in the Jalmat Gas Pool.
5. All documents, including but not limited to, reserve projections, corresponding pressure data, geological studies, engineering evaluations, and production data, whether generated by you or by consultants working on your behalf, or other persons which you have referenced or relied upon with respect to your request for unorthodox locations, simultaneous dedication or other development related to the Subject Wells.
6. All documents which reflect the ownership interest or operating rights of any kind in the proration units on which the Subject Wells are sited, or in the Subject Wells themselves if different from interests in the oil and gas leases, including all documents which establish Raptor Resources, Inc. status as operator of the Subject Wells and agreements between Raptor Resources Inc. and the owners of such interests.
7. All documents, including but not limited to (a) land files, (b) assignments and bills of sale, transfers of interest, assignments of interest in the Subject Wells, or of acreage on which the subject wells are located, between you and any other party, (c) lists of interest owners for the period 1998-1999 in the acreage comprising proration units for the subject wells, and (d) all communications to or from Raptor Resources Inc. with regard to the administrative applications to the NMOCD for the Subject Wells.

8. All documents referencing any communication between you and the NMOCD, its Director, hearing examiners, agents, and employees, including but not limited to meeting notes, expense statements, telephone message slips, telephone bills, memoranda and correspondence, regarding your infill drilling activities for the Jalmat Gas Pool in Lea County, New Mexico.
9. Concerning offset operators to the Subject Wells provide:
 - (a) Copies of reports of any Lea County real estate title searches in 1999;
 - (b) Copies of offset operator plats along with receipts, cancelled checks or other documents which establish the date each plat was acquired.
 - (c) Each and every version of the October 20, 1999 letter, from Bill R. Keathly to Michael Stogner regarding Application to re-complete State "A" A/C Well No. 54 in Section 8, T-22-S, R-36-E, including all attachments to those letters.
 - (d) Documents evidencing the substitution at the NMOCD of the edition of the letter referenced in (c) above for the letter omitting Doyle Hartman as an offset operator with the letter including him as an offset operator both dated October 20, 1999.
10. Daily field reports, service company stimulation reports and any other documents showing the dates and nature of work done by you on the State "A" A/C-2 Well No. 54 at any time.



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

December 14, 1999

VIA FAX AND MAIL

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
P.O. Box 2265
Santa Fe, NM 87504-2265

Attorneys for SDX Resources, Inc.

J.E. Gallegos, Esq.
Michael J. Condon, Esq.
Gallegos Law Firm
460 St. Michael's Drive
Santa Fe, NM 87505

Attorneys for Doyle Hartman, Oil Operator

William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan, P.A.
P.O. Box 2208
Santa Fe, NM 87504-2208

Attorneys for Raptor Resources, Inc.

RE: Cases No. 12301 and 12302 ---Applications of SDX Resources, Inc. for
unorthodox infill gas well locations in the Jalmat Gas Pool
Cases No. 12303 and 12304---Applications of Raptor Resources, Inc. for
unorthodox infill gas well locations in the Jalmat Gas Pool

Gentlemen:

The above-referenced cases have been consolidated and continued to the January 6, 2000 Examiner Hearing with Michael Stogner as Hearing Examiner. The response date for responding to Hartman's subpoenas was extended to December 6, 1999. The Division has received SDX's Motion to Quash and Raptor's Response and Motion to Quash in Part, both dated December 6, 1999. The Division has not yet received Hartman's responses to the Motions to Quash and Quash in Part, if in fact responses are forthcoming.

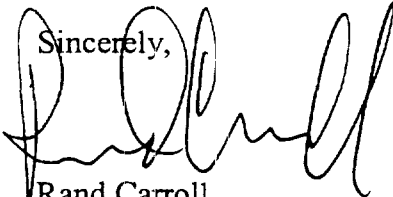
The Division has also received Hartman's letter dated November 9, 1999 requesting the Division reconsider Administrative Orders SD-99-14 and SD-99-15 issued to SDX,

vacate those orders and set the SDX applications for public hearing, as well as the response of SDX from Mr. Kellahin dated December 6, 1999.

With the holidays approaching and these cases set for January 6, 2000, it appears that a prehearing conference is necessary to hear arguments on the Motions to Quash and to discuss how best to proceed. The issue has been raised regarding whether these cases are the appropriate forums for addressing how the Jalmat Gas Pool should be developed. At the prehearing conference, we will discuss whether a new case should be docketed to address amending the Jalmat Special Pool Rules and whether the referenced cases should be stayed, and the administrative orders vacated and those applications stayed, pending the outcome of the possible case to amend the Special Pool Rules.

Please let me know if your schedules for either Monday, December 21 or Tuesday, December 22, permit time for a prehearing conference. I will be out of the office from December 22 to January 3, 2000. Mr. Stogner is out until December 21. It could be that the January 6 hearing date will have to be continued further.

If you have any questions, please feel free to call me at 827-8156.

Sincerely,

Rand Carroll

c: Michael E. Stogner, OCD Hearing Examiner



LTR



Job separation sheet



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

November 8, 1999

Raptor Resources, Inc.
901 Rio Grande
Austin, Texas 78701

#12303

Attention: Bill R. Keathly

Re: Administrative applications submitted to the New Mexico Oil Conservation Division ("Division") on October 6 and 7, 1999 for exceptions to the well location requirements provided within the "*Special Rules and Regulations for the Jalmat Gas Pool*", as promulgated by Division Order No. R-8170, as amended, for two unorthodox Jalmat infill gas well locations within an existing non-standard 480-acre gas spacing and proration unit {approved by Division Order No. R-9073, dated December 14, 1989 [Paragraph No. (4) of Exhibit "A"]} comprising the N/2 and SW/4 of Section 9, Township 22 South, Range 36 East, NMPM, all in Lea County, New Mexico. The two existing: (i) State "A" A/C-2 Well No. 30 (API No. 30-025-08855), located at an unorthodox Jalmat infill gas well location 1980 feet from the North line and 660 feet from the West line (Unit E) of Section 9; and (ii) State "A" A/C-2 Well No. 48 (API No. 30-025-08845), located at an unorthodox Jalmat infill gas well location 660 feet from the North line and 1980 feet from the East line (Unit B) of Section 9, are currently completed in the South Eunice-Seven Rivers-Queen Pool at standard oil well locations; however, both are to be plugged back and recompleted up-hole into the Jalmat Gas Pool. This unit is currently simultaneously dedicated to the applicant's State "A" A/C-2 Wells No. 1, 4, 29, 38, 40, 57, 63, 67, and 72.

Dear Mr. Keathly:

On October 21, November 1, and November 3, 1999 the Division received objections from Doyle Hartman, Oil Operator to the subject applications (I believe you were provided copies of these letters).

These two applications will be combined and set for hearing before a Division Hearing Examiner on the next available docket scheduled for December 2, 1999. Please provide adequate notice pursuant to Rule 1207.A(5) of the Division's Rules and Regulations.

Should you have any questions concerning this matter, please contact me in Santa Fe at (505) 827-8185.

Sincerely,

Michael E. Stogner
Chief Hearing Officer/Engineer

MES/kv

cc: New Mexico Oil Conservation Division - Hobbs
New Mexico State Land Office - Santa Fe
Kathy Valdes - OCD, Santa Fe
Doyle Hartman - Midland, Texas
J. E. Gallegos, Legal Counsel for Doyle Hartman - Santa Fe