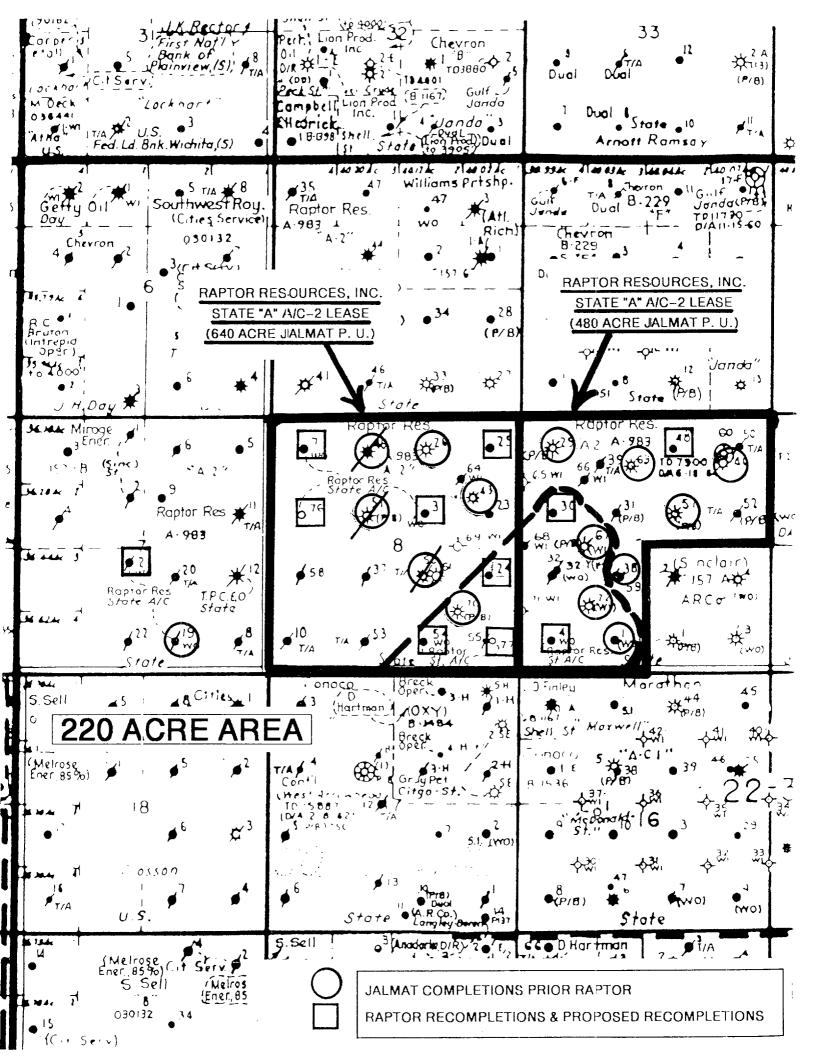
# **EXHIBIT "H"**



#### DOYLE HARTMAN

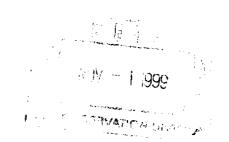
Oil Operator

3811 TURTLE CREEK BLVD., SUITE 200 DALLAS, TEXAS 75219

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October 30, 1999

6 PAGES



# VIA FACSIMILE: 512/478-4476

Raptor Resources, Inc. 901 Rio Grande (78701) P.O. Box 160430 Austin, TX 78716-0430

Attn: Russell Douglass, President Mike Nell, Vice President

# **VIA FACSIMILE**: 915/684-4508

Raptor Resources, Inc. 414 W. Texas, Suite 202 Midland, TX 79701

Attn: Bill R. Keathly, Regulatory Agent

Re: Raptor's Dense-Spacing Infill Program

Jalmat Gas Pool

T-22-S & T-23-S, R-36-E Lea County, New Mexico

#### Gentlemen:

Reference is made to our letter of October 29, 1999, to Ms. Lori Wrotenbery and Mr. Michael Stonger of the New Mexico Oil Conservation Division, including our discussion corresponding to Raptor's proposed State "A" A/C-2 Nos. 54 and 77 completions located in the S/2 SE/4 Section 8, T-22-S, R-36-E.

After becoming aware of Raptor's C-103 for its proposed State "A" A/C-2 No. 54 recompletion, I have now had an opportunity to compare well logs with the C-101's that Raptor has filed for its State "A" A/C-2 Nos. 30 and 48 wells located in the NW/4 Section 9, T-22-S, R-36-E. It appears that Raptor has proposed the following completion intervals and pool designations for its Nos. 30, 48, and 54 wells.

Messrs. Russell Douglass, Mike Nell and Bill Keathly October 30, 1999 Page 2

Well	Proposed Pool <u>Designation</u>	Proposed Completion <u>Interval</u>	Top of Queen	Base of Jalmat
State "A" A/C-2 No. 30	Jalmat	2955'-3679'	3680'	3580'
State "A" A/C-2 No. 48	Jalmat	2971'-3660'	3715'	3615'
State "A" A/C-2 No. 54	Eunice South	3331'-3700'	3740'	3640'

Based on the foregoing table, in addition to our strong objections to Raptor's proposed dense-spacing infill drilling and recompletion program in its Jalmat Pool acreage, we again respectfully suggest that Raptor refer to the NMOCD's *Stratigraphic Nomenclature Committee Cross-sections* for the Jalmat and Eumont Pools, and in particular to the log picks for Marathon's McDonald State No. 6 well situated in the SE/4 SW/4 Section 16, T-22-S, R-36-E, (N-16-22S-36E), which is located just south of Raptor's State "A" A/C-2 lease.

Our objections to Raptor's infill program notwithstanding, and considering that the above table corresponds to the first three Raptor logs that I have checked against Raptor's NMOCD filings, Raptor clearly needs to familiarize itself with Southeast New Mexico geology. While becoming familiar with Southeast New Mexico geology and with the subject reservoirs, Raptor may itself realize that its proposed dense-spacing infill program is not necessary in order to efficiently and economically drain its Jalmat acreage. However, at the present, Raptor has the cart before the horse, by rapidly launching into an unnecessary dense-spacing Jalmat infill program, without first becoming highly familiar with the geology, reservoirs, and past history of the Jalmat Pool.

After becoming familiar with Southeast New Mexico geology, we also strongly suggest that Raptor review and verify its log picks for the well completions that it has performed to date.

Very truly yours,

Doyle Hartman

DH/ao Enclosures

cc w/ enc.:

Messrs. Russell Douglass, Mike Nell and Bill Keathly October 30, 1999 Page 3

# **VIA FACSIMILE: 505/827-8177**

Lori Wrotenbery, Director Michael Stogner, Chief Hearing Examiner New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505

#### **VIA FACSIMILE: 505/393-0720**

NMOCD 1625 N. French Drive Hobbs, NM 88240

Attn: Chris Williams, Supervisor and Oil & Gas Inspector

#### VIA FACSIMILE: 505/986-0741

Gallegos Law Firm 460 St. Michaels Drive, Bldg. 300 Santa Fe, New Mexico 87505

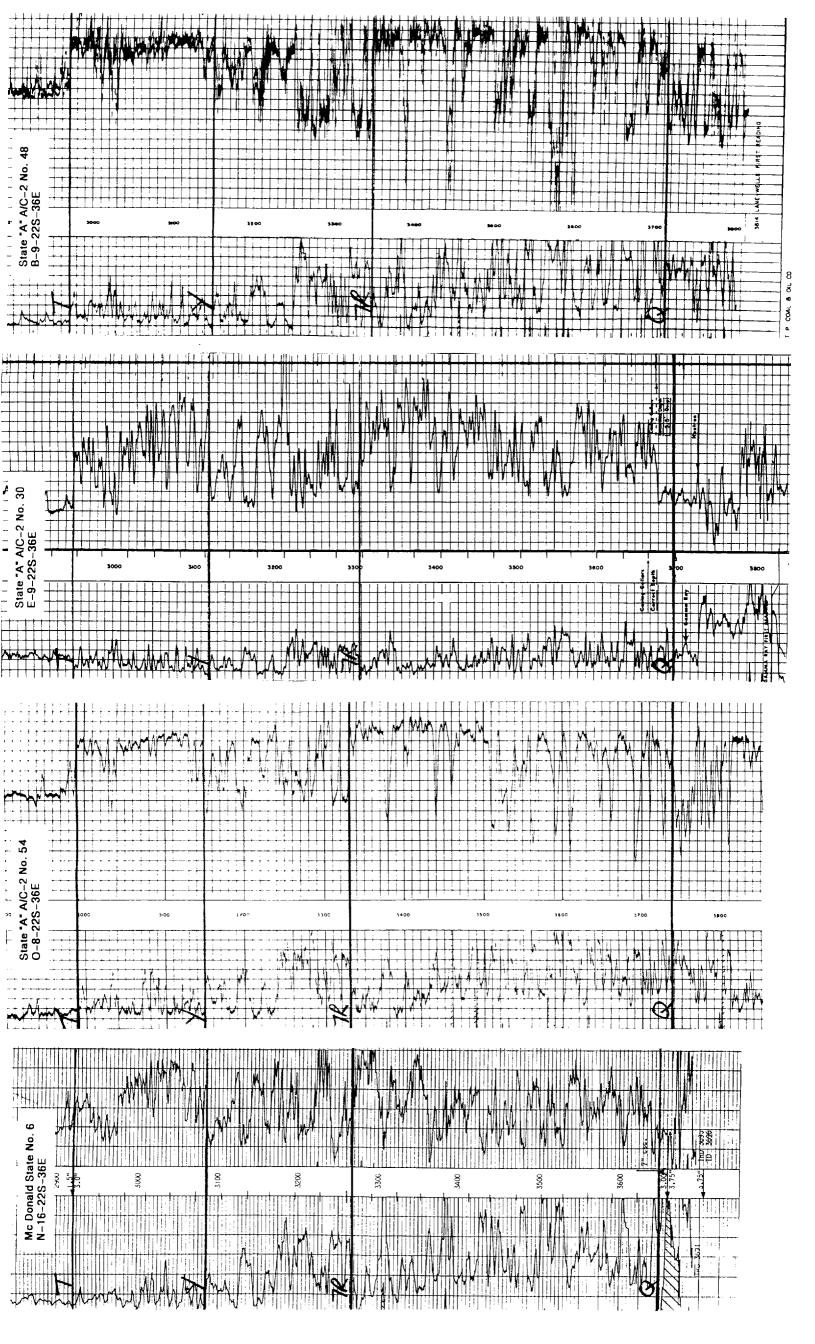
### VIA FACSIMILE: 915/682-6504

James A. Davidson 214 W. Texas, Suite 710 Midland, TX 79701

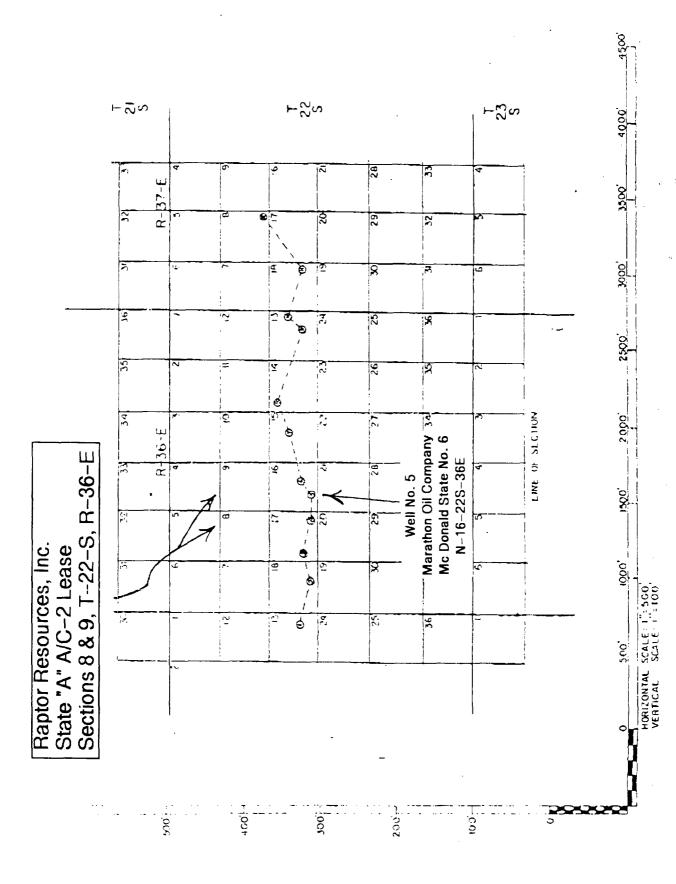
DOYLE HARTMAN, Oil Operator (Dallas)

# DOYLE HARTMAN, Oil Operator (Midland)

Don Mashburn Steve Hartman Sheila Potts Linda Land Cindy Brooks







MEXICO OIL CONSERVATION COMMISSION NEW

