B

RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

October 20, 1999

Mr. Michael Stogner New Mexico Oil Conservation Division 2040 Pacheo Santa Fe, New Mexico 87504

SERVATION DO

RE: Application for Unorthodox Gas Well Locations and Simultaneous Dedication Jalmat, Tansil Yts 7 Rvrs (Pro Gas)
660' FSL and 1980' FEL
Section 8., T 22S, R 36E (O)
Lea County, New Mexico

Dear Mr. Stogner,

Raptor Resources, Inc. respectfully requests your approval of this administrative application for the subject Unorthodox Gas Well Location and Simultaneous Dedication.

Raptor Resources, Inc. is planning to re-complete it's State "A" A/C 2 Well No. 54 in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool). It is our desire to also simultaneously dedicate the existing 640- acre Proration Unit assigned to our well nos.3, 24, 26, 25, 43and 70 to all seven wells. Previously approved orders are R 9073 and SD-99-7.

The offset operator plat shows that Conoco Inc, Chevron USA Inc OXY USA, Doyle Hartman and Finley Resources as the offset operators that could be affected by this unorthodox location. Please find enclosed evidence that they have been notified of this application.

In order to prevent waste, Raptor Resources, Inc. respectfully requests your approval of this application for an unorthodox location and simultaneous dedication. A copy of this letter and attachments has been furnished by Certified Mail to the offset operators as their notice of this application.

If you have any questions or require any further information concerning this application, please contact me at (915) 697-1609 or e-mail me at <u>BRKeathly@juno.com</u>.

Sincerely.

Bill R. Keathly Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

State "A" A/C 2 # 54 Section 8, T-22S, R-36E, (O) API # 30-025-08841 Lea County, New Mexico

RE: Application for Unorthodox Location

Notification of Offset Operators:

Conoco Inc 10 Desta Dr., Ste 100W Midland, TX 79705

Chevron U S A Inc Attn: WOJV-Business Unit P.O. Box 1635 Houston, TX 77251

OXY USA Inc P.O. Box 50250 Midland, TX 79710

Finley Resources 1308 Lake St., Ste 200 Ft. Worth, TX 75102

Doyle Hartman P.O. Box 10426 Midland, TX 79702

Please find attached evidence that the above listed companies have been sent copies of the Non-standard location request.

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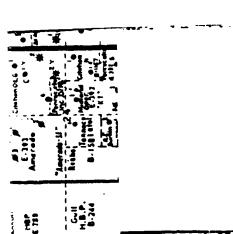
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