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RAPTOR RESOURCES, INC.

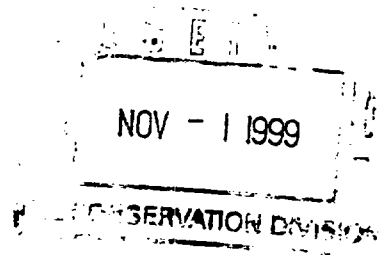
901 Rio Grande

Austin, Texas 78701

(512) 478-4427

October 20, 1999

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



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 BRKeathly@juno.com.

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 76102

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

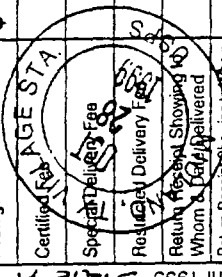
Please find attached evidence that the above listed companies have been sent copies of the Non-standard location request.

Z 444 966 652

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

| | |
|---|-----------------------|
| Sent to | Doyle Hartman |
| Street & Number | Box 1426 |
| Post Office, State, & ZIP Code | Millersburg, KY 40322 |
| Postage | \$ 55 |
| Certified Fee | 140 |
| Special Delivery Fee | |
| Registered Delivery Fee | |
| Return Receipt Showing to Whom, Date, & Addressee's Address | 125 |
| TOTAL Postage & Fees | \$ 320 |
| Postmark or Date | |



PS Form 3800, April 1995

Conoco Inc.

Chevron USA

OXY USA

Finley Resources

Doyle Hartman

