NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

November 8, 1999

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

Attention:

Bill R. Keathly

Re:

Administrative application submitted to the New Mexico Oil Conservation Division on October 25 and November 1, 1999 for an exception 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 an unorthodox Jalmat infill gas well location within an existing standard 640-acre gas spacing and proration unit comprising all of Section 8, Township 22 South, Range 36 East, NMPM, all in Lea County, New Mexico. The existing State "A" A/C-2 Well No. 54 (API No. 30-025-08841), located at an unorthodox Jalmat infill gas well location 660 feet from the South line and 1980 feet from the East line (Unit O) of Section 8, is currently completed in the South Eunice-Seven Rivers-Queen Pool at a standard oil well location; however, this well is 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. 3, 24, 25, 26, 43, and 70.

Dear Mr. Keathly:

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

This application will therefore be 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