



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

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

October 12, 1999

Raptor Resources, Inc.  
901 Rio Grande  
Austin, Texas 78701  
Attention: Bill R. Keathly, Regulatory Agent

*Administrative Order NSP-1809(L)(SD)*

Dear Mr. Keathly:

Reference is made to the following: (i) your applications dated September 14, 1999; and (ii) the records of the New Mexico Oil Conservation Division ("Division") in Santa Fe, including the files on Division Order No. R-9073, issued in Case No. 9775 dated December 14, 1989, and Division Administrative Order NSL-4352 (SD), dated August 30, 1999: all concerning Raptor Resources, Inc.'s request for a 280-acre non-standard gas spacing and proration unit ("GPU") consisting of the following acreage in the Jalmat Gas Pool:

LEA COUNTY, NEW MEXICO  
TOWNSHIP 23 SOUTH, RANGE 36 EAST, NMPM  
Section 3: N/2 SW/4, SW SW/4, and SE/4.

It is our understanding that this unit is to be simultaneously dedicated to the following described wells:

- (1) State "A" A/C-1 Well No. 30 (API No. 30-025-09238), located at an unorthodox gas well location for the subject 280-acre GPU 1650 feet from the South line and 990 feet from the East line (Unit I) of Section 3;
- (2) State "A" A/C-1 Well No. 35 (API No. 30-025-09237), located at a standard gas well location for this 280-acre GPU 1650 feet from the South line and 990 feet from the West line (Unit L) of Section 3;
- (3) State "A" A/C-1 Well No. 43 (API No. 30-025-09236), located at a standard gas well location for this 280-acre GPU 660 feet from the South and West lines (Unit M) of Section 3;
- (4) State "A" A/C-1 Well No. 61 (API No. 30-025-09232),