

RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

December 8, 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)
1980' FSL and 1980' FEL
Section 5, T 22S, R 36E (J)
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.

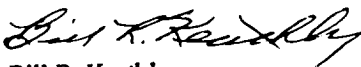
Raptor Resources, Inc. is planning to re-complete it's State "A" A/C 2 Well No. 34 in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool). We request a decrease in the size of the existing 440-acre GPU by 80 acres to exclude the SE/4 NW/4 Unit F and the SW/4 SE/4 Unit O of Section 5. It is our desire to also simultaneously dedicate the existing 360-acre Proration Unit assigned to our well no. 47, 27 & 46 to all four wells. Previously approved orders are R 9073, NSP 518. Well nos. 33 and 44 are being assigned the 40 acre proration Units (SE/4 NW/4 Unit F and SW/4 SE/4 Unit O) of section 5. Due to being reclassified from gas to oil in the Jalmat Tansil Yates 7-Rivers Oil pool per the NMOC in Hobbs. Well no 27 located in the SE/4 SE/4 Unit P, is being reclassified from oil to gas in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool).

The offset operator plat shows that Chevron USA, Conoco Inc, Southwest Royalties and Permian Resources Inc. 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