



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

Bill Richardson
Governor
Joanna Prukop
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

January 8, 2003

Raptor Resources, Inc.
c/o Holland & Hart LLP
P. O. Box 2208
Santa Fe, New Mexico 87504-2208
Attention: William F. Carr

Telefax No. (505) 983-6043

Administrative Order NSP-1862 (SD)

Dear Mr. Carr:

Reference is made to the following: (i) your application (*application reference No. pKRV0-235438380*) on behalf of the operator, Raptor Resources, Inc.'s ("Raptor"), dated December 19, 2002; and (ii) the New Mexico Oil Conservation Division's ("Division") records in Santa Fe, including the files on Division Administrative Orders NSL-2727, NSL-2729, NSL-2731, NSL-4371 (SD), and SD-01-09 and Division Cases No. 9775 (which resulted in the issuance of Division Orders No. R-9073 and R-9073-B) and No. 12623 (which resulted in the issuance of Division Order No. R-11591): all concerning Raptor's requests to decrease the acreage of the existing 520-acre non-standard gas spacing unit for the Jalmat Gas Pool (79240), comprising the S/2 NE/4, N/2 SE/4, and SE/4 SE/4 of Section 9 and the W/2 of Section 10, both in Township 23 South, Range 36 East, NMPM, Lea County, New Mexico, by deleting therefrom the 40-acre tract comprising the SE/4 SE/4 (Unit P) of Section 9.

This 520-acre non-standard gas spacing unit was initially established by Division Order No. R-9073, issued in Case No. 9775 and dated December 14, 1989, as amended by Division Order No. R-9073-B [Paragraph No. (8) of Exhibit "A"].

Your application submitted on behalf of Raptor has been duly filed under the provisions of the "*Special Pool Rules for the Jalmat Gas Pool*," as promulgated by Division Order No. R-8170-P, issued in Case No. 12563 on December 14, 2001.

It is our understanding from this application and the Division's records that the following ten wells are shown to be currently dedicated to the aforementioned 520-acre non-standard gas spacing unit:

- (1) the existing State "A" A/C-1 Well No. 37 (API No. 30-025-09290), located 1650 feet from the North and West lines (Unit F) of Section 10, which well was the subject of Division Orders No. R-9073 and R-9073-B;

(2) the existing State "A" A/C-1 Well No. 38 (API No. 30-025-09291), located 990 feet from the South and West lines (Unit M) of Section 10, which well was also the subject of Division Orders No. R-9073 and R-9073-B;

(3) the existing State "A" A/C-1 Well No. 49 (API No. 30-025-09292), located 660 feet from the North and West lines (Unit D) of Section 10, which well was the subject of Division Administrative Order NSL-2729, dated December 7, 1989, as amended by order dated July 22, 1991;

(4) the existing State "A" A/C-1 Well No. 55 (API No. 30-025-09293), located 1980 feet from the North line and 660 feet from the West line (Unit E) of Section 10;

(5) the existing State "A" A/C-1 Well No. 81 (API No. 30-025-09295), located 660 feet from the North line and 1980 feet from the West line (Unit C) of Section 10, which well was the subject of Division Administrative Order NSL-4371, dated October 25, 1999;

(6) the existing State "A" A/C-1 Well No. 88 (API No. 30-025-09297), located 1980 feet from the South and West lines (Unit K) of Section 10, which well was the subject of Division Administrative Order NSL-2727, dated December 7, 1989, as amended by order dated July 22, 1991;

(7) the existing State "A" A/C-1 Well No. 89 (API No. 30-025-09298), located 660 feet from the South line and 1980 feet from the West line (Unit N) of Section 10, which well was the subject of Division Administrative Order NSL-2731, dated December 7, 1989, as amended by order dated July 22, 1991;

(8) the recently drilled State "A" A/C-1 Well No. 130 (API No. 30-025-35552), located 660 feet from the South and East lines (Unit P) of Section 9, which well was the subject of Division Order No. R-11591, issued in Case No. 12623 on May 31, 2001;

(9) the recently drilled State "A" A/C-1 Well No. 131 (API No. 30-025-35556), located 1980 feet from the South line and 660 feet

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from the East line (Unit I) of Section 9, which well was also the subject of Division Order No. R-11591); and

(10) the previously plugged and abandoned Clayton W. Williams, Jr., Inc. State "A" A/C-1 Well No. 56 (API No. 30-025-09294), located 1980 feet from the South line and 660 feet from the West line (Unit L) of Section 10 is to be re-entered and completed to the Jalmat Gas Pool.

IT SHALL BE NOTED AT THIS TIME THAT the locations of all the above described State "A" A/C-1 Wells No. 37, 38, 49, 55, 56, 81, 88, 89, 130, and 131 are now considered to be standard for this 520-acre non-standard unit pursuant to Rule 3 (A) (2) of the special rules currently governing the Jalmat Gas Pool.

It is our understanding that the above described State "A" A/C-1 Well No. 130 in Unit "P" of Section 9 was recently completed as a Jalmat "oil" well and its corresponding 40-acre standard oil spacing and proration unit comprising the SE/4 SE/4 (Unit P) of Section 9 is to be omitted from the 520-acre non-standard gas unit at this time.

By the authority granted me under the provisions of Rules 4 (B) and (D) of the special rules governing the Jalmat Gas Pool, the following described 480-acre non-standard gas spacing unit is hereby approved:

LEA COUNTY, NEW MEXICO
TOWNSHIP 23 SOUTH, RANGE 36 EAST, NMPM

Section 9: S/2 NE/4 and N/2 SE/4

Section 10: W/2.

Also, pursuant to Rule 6 (B) of the Jalmat special pool rules, Raptor is hereby authorized to simultaneously dedicate Jalmat gas production from the State "A" A/C-1 Wells No. 37, 38, 49, 55, 56, 81, 88, 89, and 131.

All provisions applicable to this newly formed 480-acre non-standard gas spacing unit in Division Orders No. R-9073 and R-9073-B and Division Administrative Order SD-01-09 not in conflict with this order shall remain in full force and affect until further notice. At this time Division Administrative Orders NSL-2727, as amended, NSL-2729, as amended, NSL-2731, as amended, and NSL-4371 (SD) and Division Order No. R-11591 are hereby placed in abeyance until further notice.

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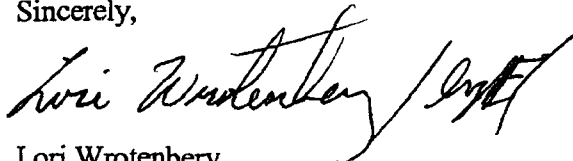
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Jurisdiction of this matter shall be further retained for the entry of any such subsequent orders, as the Division may deem necessary.

Sincerely,



Lori Wrotenbery
Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Hobbs
New Mexico State Land Office - Santa Fe

File: NSL-2727
NSL-2729
NSL-2731
NSL-4371 (SD)
SD-01-09 /