

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION 2040 South Pacheco Street Santa Fe, New Mexico 87505 (805) 827-7131

December 22, 1999

W. Thomas Kellahin, Esq. Kellahin & Kellahin P.O. Box 2265 Santa Fe, NM 87504-2265

Attorneys for SDX Resources, Inc.

J.E. Gallegos, Esq. Michael J. Condon, Esq. Gallegos Law Firm 460 St. Michael's Drive Santa Fe, NM 87505

Attorneys for Doyle Hartman, Oil Operator

William F. Carr, Esq. Campbell, Carr, Berge & Sheridan, P.A. P.O. Box 2208 Santa Fe, NM 87504-2208

Attorneys for Raptor Resources, Inc.

RE: Cases No. 12301 and 12302 --- Applications of SDX Resources, Inc. for unorthodox infill gas well locations in the Jalmat Gas Pool Cases No. 12303 and 12304--- Applications of Raptor Resources, Inc. for unorthodox infill gas well locations in the Jalmat Gas Pool

Gentlemen:

At the prehearing conference held on Tuesday, December 21, the Division took the following actions:

- (i) the APDs and other approvals for the SDX and Raptor wells complained of by Hartman were rescinded with the applications to be stayed pending the March 2, 2000, hearing on the Jalmat Special Pool Rules;
- (ii) a new case will be docketed by the Division for March 2, 2000, to review the Jalmat Special Pool Rules;

- (iii) a Jalmat Pool operators meeting will be held on Tuesday, January 25 at the OCD Hobbs District Office to review the Jalmat Special Pool Rules with SDX, Raptor and Hartman to attend, with the possibility of a second operators meeting to be held prior to the March 2, 2000, hearing;
- (iv) a notice will be issued to all Jalmat Pool operators placing a moratorium on all new Jalmat infill wells on a greater density than 160 acres pending the March 2 hearing; and
- (v) the above-referenced applications as well as the Motions to Quash will be stayed pending the March 2 hearing.

If you have any questions, please feel free to call me at 827-8156. I will be out of the office until January 4, 2000.

Sincerely Rand Carroll

c: Lori Wrotenbery, OCD Director Michael E. Stogner, OCD Hearing Examiner David Catanach, OCD Hearing Examiner Mark Ashley, OCD Hearing Examiner Chris Williams, OCD Hobbs District Supervisor



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

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

January 5, 2000

W. Thomas Kellahin, Esq. Kellahin & Kellahin P.O. Box 2265 Santa Fe, NM 87504-2265

Attorneys for SDX Resources, Inc.

J.E. Gallegos, Esq. Michael J. Condon, Esq. Gallegos Law Firm 460 St. Michael's Drive Santa Fe, NM 87505

Attorneys for Doyle Hartman, Oil Operator

William F. Carr, Esq. Campbell, Carr, Berge & Sheridan, P.A. P.O. Box 2208 Santa Fe, NM 87504-2208

Attorneys for Raptor Resources, Inc.

RE: Clarification of December 22, 1999 letter from Rand Carroll

Gentlemen:

Paragraph (i) of the above-referenced letter refers to Division actions regarding SDX and Raptor wells. This letter clarifies which wells and/or applications are affected by that letter and what actions will be taken by the Division.

Cases No. 12301, 12302, 12303 and 12304 will be continued to the March 16, 2000 docket, the docket after the docket at which the Division's application to review the Jalmat Special Pool Rules will be heard.

Hartman's objections/protests to Orders No. SD 99-14 and SD 99-15 will be set for hearing as an application of Hartman for rescission of those orders. This application will also be set for hearing on March 16, 2000.

The NSL orders issued to Raptor in which notice should have been given to Hartman as an offset operator but was not are reopened pursuant to Rule 1207.D. and will also be set for hearing on March 16, 2000. Such NSL orders include Orders No. NSL 2872-C(SD), NSL 2723-D(SD), NSL 2723-E and NSL 2816-C(SD). Hartman must notify the Division of any additional NSL applications in this category.

No wells other than the wells that are the subject of the above-referenced cases and orders are affected by the December 22, 1999 letter.

Approvals for all Jalmat infill wells on a density of less than 160 acres per well have been held since December 23, 1999 and will continue to be held pending the March 2, 2000 hearing.

The Division trusts that the parties will actively participate at the Jalmat Pool operators meeting on January 25, 2000 at the OCD District Office in Hobbs and that an agreeable solution can be worked out regarding further development of the Jalmat Pool.

Sincerely,

notenbery

Lorí Wrotenbery Director

¢:

Don Kane, Esq., Gorsuch & Kirgis LLP Rand Carroll, OCD Legal Counsel Michael E. Stogner, OCD Hearing Examiner David Catanach, OCD Hearing Examiner Mark Ashley, OCD Hearing Examiner Chris Williams, OCD Hobbs District Supervisor



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

NOTICE: Jalmat Operators

TO:	All Operators in the Jalmat Pool
FROM:	Michael E. Stogner, Chief Hearing MS. Examiner/Engineer (NMOCD)
SUBJECT:	 (1) Approvals for Infill Gas Wells and (2) Operators Meeting to Review the Rules Governing the Jalmat Pool.
DATE:	January 11, 2000

The Division believes that recent issues in the Jalmat Pool warrant review of the rules and procedures governing this pool.

Since December 23, 1999, the Division has been holding and not approving applications for additional gas wells on a density of less than 160 acres pending a review of the special rules governing the Jalmat Pool.

An Operators' meeting is therefore scheduled for January 25, 2000 in Hobbs, New Mexico at the Division's District office located at 1625 N. French Drive. This meeting will start at 9:00 a.m. and is expected to conclude by 12:30 p.m. All participants are encouraged to discuss openly any problems, concerns, and issues affecting this pool. Further, proposed rule changes by all operators will be discussed and, if needed, a committee will be formed to entertain such changes and prepare a formal presentation to be considered for adoption.

A Division Examiner's Hearing is scheduled on March 2, 2000 for the Operators group to report and make recommendations of possible rule changes.

It is important that all operators in the Jalmat Pool participate so that a full and comprehensive discussion is held identifying all pertinent issues affecting further development of this pool.

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STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

> OIL CONSERVATION DIVISION HOBBS DISTRICT OFFICE

12/15/99

POST OFFICE BOX 1980 HOBBS, NEW MEXICO 88241-1980 (505) 393-6161

GOVERNOR

OIL CONSERVATION DIVISION P. O. BOX 2088 SANTA FE, NEW MEXICO 87501

RE: Proposed: MC DHC NSL NSP SWD WFX PMX

Gentlemen:

I have examined the application for the:

-T-R 312-025-08800 Kespurces Inc State Lease & Well No. 'C-Operator

and my recommendations are as follows:

102- needs better description of 360 screes.

Yours very truly,

Chris Williams Supervisor, District 1

/ed

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION HOBBS DISTRICT OFFICE

12/15/99

POST OFFICE BOX 1980 HOBBS, NEW MEXICO 88241-1980 (505) 393-6161

GOVERNOR

OIL CONSERVATION DIVISION P. O. BOX 2088 SANTA FE, NEW MEXICO 87501

 RE:
 Proposed:

 MC
 DHC

 DHC
 SD

 NSL
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 WFX
 PMX

Gentlemen:

I have examined the application for the:

2 # 34-J-5-22 S-T-R 30-025-087 - 36e 4 PSDUSCES Lease & Well Kastor Operator Unit

and my recommendations are as follows:

Yours very truly,

dum

Chris Williams Supervisor, District 1

/ed



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

November 19, 1999

Raptor Resources, Inc. Attention: Bill R. Keathley 901 Rio Grande Austin, Texas 78701

> Re: Administrative application for acreage rededication within the Jalmat Gas Pool in Section 5, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico.

Dear Mr. Keathley:

Per our telephone conversation today, the subject application filed with the Division in Santa Fe on October 25, 1999 is hereby withdrawn and is being returned to you at this time.

Sincerely,

Michael E. Stogner Chief Hearing Officer/Engineer

MES/kv

cc: New Mexico Oil Conservation Division - Hobbs Kathy Valdes - NMOCD, Santa Fe William F. Carr, Legal Counsel for Raptor Resources, Inc. - Santa Fe



NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

November 19, 1999

Raptor Resources, Inc. Attention: Bill R. Keathley 901 Rio Grande Austin, Texas 78701

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Dear Mr. Keathley:

Per our telephone conversation today, the subject application filed with the Division in Santa Fe on October 25, 1999 is hereby withdrawn and is being returned to you at this time.

Sincerely,

Michael E. Stogner Chief Hearing Officer/Engineer

MES/kv

cc: New Mexico Oil Conservation Division - Hobbs
 Kathy Valdes - NMOCD, Santa Fe
 William F. Carr, Legal Counsel for Raptor Resources, Inc. - Santa Fe

NSL (SD) 11/15/99

RAPTOR RESOURCES, INC.

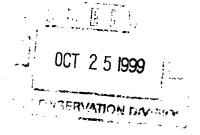
901 Rio Grande

Austin, Texas 78701

(512) 478-4427

October 18, 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 11-19-99

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,

Heathly called Withdrawing This 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 400-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 280-acre Proration Unit assigned to our well no .27 to both 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 NMOCD in Hobbs. Well no 27 located in the SE/4 SE/4 Unit P, is being reclassified from oil to gas.

The offset operator plat shows that Chevron USA, CITGO, Southwest Royalties and Lion Production 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

State "A" A/C 2 # 34 Section 5, T-22S, R-36E, (J) API # 30-025-08794 Lea County, New Mexico

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RE: Application for Unorthodox Location

3

Notification of Offset Operators:

Chevron U S A Inc Attn: WOJV-Business Unit P.O. Box 1635 Houston, TX 77251

CITGO P.O. Box 3758 Tulsa, Okla. 74102

Lion Production Inc P.O. Box 2086 Midland, TX 79702

Southwest Royalties Inc P.O. Box 11390 Midland, TX 79702

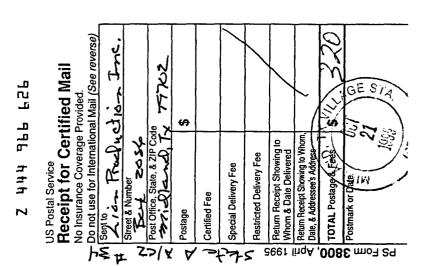
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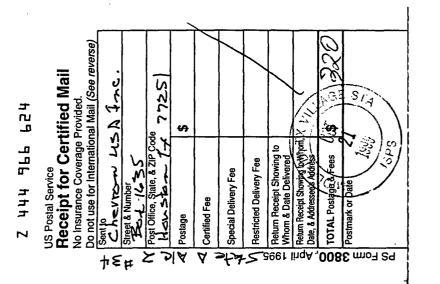
Please find attached evidence that the above listed companies have been sent copies of the Non-standard location request.

Do not use for International Mail (See reverse) **Receipt for Certified Mail** 2 No Insurance Coverage Provided. ð GESIA æ ŝ 1 то С Return Receipt Showing to Whom Date, & Addressee's Address Return Receipt Showing to Whom & Date Delivered 996 TOTAL Postage & Fees Post Office, State, & ZIP Restricted Delivery Fee Street & Number 1º v Sent to CITGO V Special Delivery Fee **US Postal Service** mark or Date 202 Certified Fee Postage N PS Form 3800, April 1995 75p 7/X A 34345 7

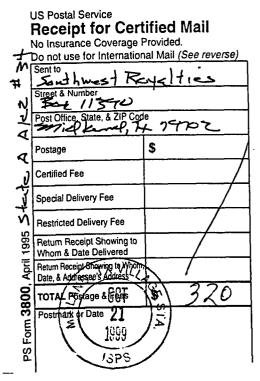
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District 1 PO Box 1980. Hobbs. NM 88241 1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV PO Box 2088. Santa Fe, NM 87504 2088

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State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe. NM 87504-2088

Form C-101 Revised February 10, 1994 Instructions on back Submit to Appropnate District Offico State Lease - 6 Copies Fee Lease - 5 Copies

AMENDED REPORT

APPLICATION FOR PERMIT TO DR1LL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

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District I PO Box 1980, Hobbs. NM 88241-1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III

1000 Rio Brazos Rd. Aztec, NM 87410 District IV PO Box 2088, Santa Fe. NM 87504-2088 State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Revised February 21, 1994 instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

____ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

AF	PI Numbe	٢	1	2 Pool C	ode		3 Pool Name				
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Form C-102

RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

NSL(SA) 1/3/00

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December 8, 1999

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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 NMOCD 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 <u>BRKeathly@juno.com</u>.

Sincerely,

Dier R. Reuch

Bill R. Keathly Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

State "A" A/C 2 # 34 Section 5, T-22S, R-36E, (J) API # 30-025-08794 Lea County, New Mexico

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RE: Application for Unorthodox Location

Notification of Offset Operators:

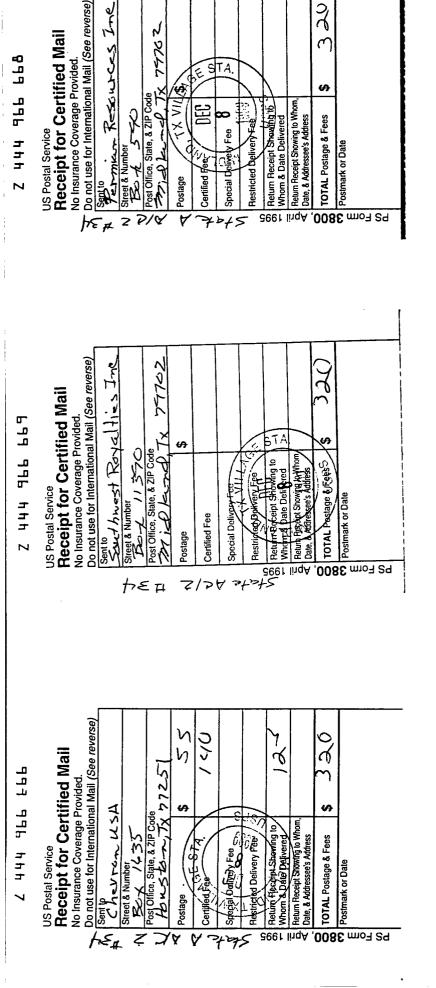
Chevron U S A Inc Attn: WOJV-Business Unit P.O. Box 1635 Houston, TX 77251

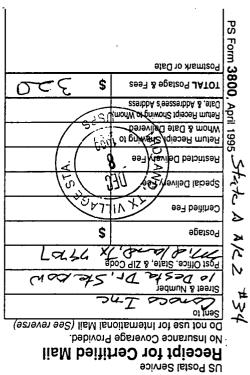
Conoco Inc 10 Desta Dr., Suite 100W Midland, TX 79705

Permian Resources Inc P.O. Box 590 Midland, TX 79702

Southwest Royalties Inc P.O. Box 11390 Midland, TX 79702

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





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404330

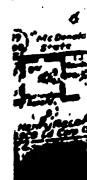
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Chevron Consco Southwest Royalties Permian Resources



District 1 PO Box 1980. Hobbs. NM 88241 1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088

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State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-101 Revised February 10, 1994 Instructions on back Submit to Appropnate District Offico State Lease - 6 Copies Fee Lease - 5 Copies

____AMENDED REPORT

APPLICATION FOR PERMIT TO DR1LL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

									,		
Raptor F			· · · · (Operator Nan	ne and Address.					•	OGRID No_ 162791
901 Ric	o Grande	•									API Number
Austir	n, Tx. 78	701								30 - 0	25-08794
' Prope	rty Code					roperty Name					'Well No.
24	671				Sta	te 'A' A/C 2					34
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s Proposed Bottom Hole Location If Different From Surface											
UL or lot no	Section	Township	Range	Lot Idn	Feet from the	North/South	line	Feet from the	East/V	Vest line	County
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Jaln	nat, Tnsl,	Yts, 7-Riv	vers (Pro	Gas) (792	240)						
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					l	es/7 Rvrs					
21 Proposed Casing and Cement Program											
Hole S	ize	Casir	ig Size	Casir	ng weight/foot	Setting D	epth	Sacks o	of Cemen	<u>'</u>	Estimated TOC
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Printed name:		Bill R. K		/		fitle:					
Title:	Rem	latory Age		antor	<u> </u> ,	pproval Date:			Expiratio	on Date:	
Date:	K egi	natory Age	Phone	ipi0i	I	Conditions of App	roval				
	12-8-99			915) 697-		Attached					

Form C-102

District I PO Box 1980, Hobbs. NM 88241-1980

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District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd. Aztec, NM 87410 District IV PO Box 2088, Santa Fe. NM 87504-2088 State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Revised February 21, 1994 instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT												
AF	PI Numbe	r		2 Pool C	ode	3 Pool Name						
30-	025-0879	94		79240		Jalma	t, Tnsl, Yts, 7-	Rivers (P				
4 Property	Code				5 Prope	rty Name			6 We	II Number		
24671					State 'A'					34		
7 OGRID No.			_		8 Opera	ator Name		9 Elevation				
16279	1	Rapto	or Resou	rces, Inc,					L			
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UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/We	ist line	County		
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UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/We	ist line	County		
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RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

NSL(SD) 1/3/00

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)
660' FSL and 1980' FWL
Section 5, T 22S, R 36E (N)
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. 46** 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 to all three 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 NMOCD 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 <u>BRKeathly@juno.com</u>.

Sincerely,

Riel K. Loud

Bill R. Keathly Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

State "A" A/C 2 # 46 Section 5, T-22S, R-36E, (N) API # 30-025-08800 Lea County, New Mexico

RE: Application for Unorthodox Location

Notification of Offset Operators:

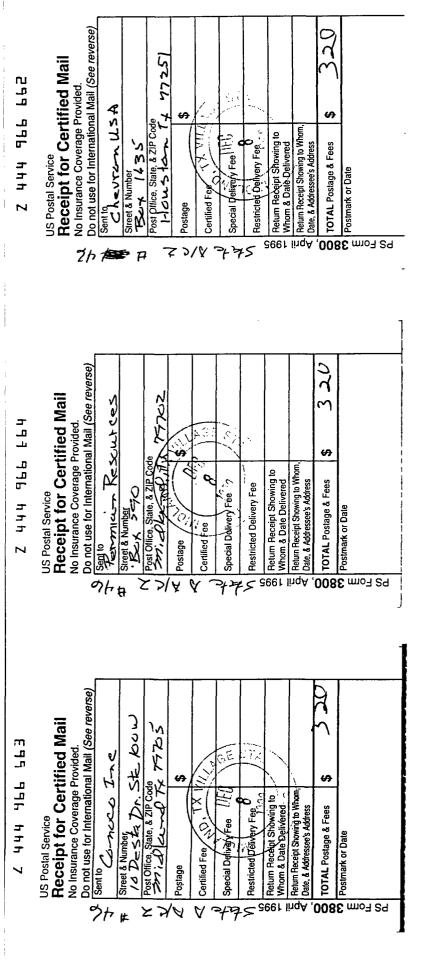
Chevron U S A Inc Attn: WOJV-Business Unit P.O. Box 1635 Houston, TX 77251

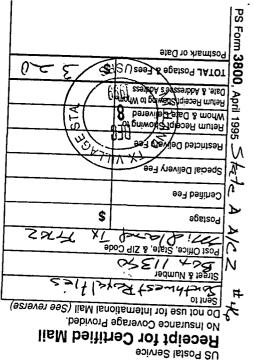
Conoco Inc 10 Desta Dr., Suite 100W Midland, TX 79705

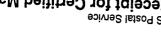
Permian Resources Inc P.O. Box 590 Midland, TX 79702

Southwest Royalties Inc P.O. Box 11390 Midland, TX 79702

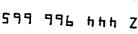
Please find attached evidence that the above listed companies have been sent copies of the Non-standard location request.









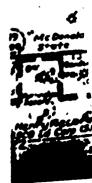


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Conoco Southwest Royalties Permian Resources



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District 1 PO Box 1980. Hobbs. NM 88241 1980 District 11 PO Drawer DD, Artesia, NM 88211-0719 District 111 1000 Rio Brazos Rd., Aztec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088 State of New Mexico Energy. Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-101 Revised February 10. 1994 Instructions on back Submit to Appropriate District Offico State Lease - 6 Copies Fee Lease - 5 Copies

_AMENDED REPORT

APPLICATION FOR PERMIT TO DR1LL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

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Raptor F	Resource	es, Inc.	•	Operator Nar	ne and Address.						GRID No_ 162791	
901 Ric	Grande	•								'.	API Number	
Austir	n, Tx. 78	701				^{30 - 0} 25-08800					25-08800	
' Prope	rty Code				• • • • • •	roperty Name					'Well No.	
24	671				Sta	te 'A' A/C 2					46	
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Date:	12-8-99		Phone	(915) 697		Conditions of App	oroval:					
			1	(=,		Attached						

Form C-102

District I PO Box 1980, Hobbs. NM 88241-1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd. Aztec, NM 87410 District IV PO Box 2088, Santa Fe. NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Revised February 21, 1994 instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

	WELL LOCATION AND ACREAGE DEDICATION PLAT											
AF	PI Numbe	۲.		2 Pool	Code	3 Pool Name						
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4 Property	Code				-	erty Name			6 We	Il Number		
24671					State 'A			46				
7 OGRID No.			-		-	rator Name			9 EI	evation		
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NSL(SD)

RAPTOR RESOURCES, INC.

901 Rio Grande

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Austin, Texas 78701

(512) 478-4427

1/5/00

December 12, 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 660' FWL Section 5, T 22S, R 36E (L) 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. 2** 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's 47, 27, 34 & 46 to all five 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 NMOCD 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 <u>BRKeathlv@juno.com</u>.

Sincerely,

Diel R. Zoully

Bill R. Keathly Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

State "A" A/C 2 # 2 Section 5, T-22S, R-36E, (L) API # 30-025-08791 Lea County, New Mexico

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RE: Application for Unorthodox Location

Notification of Offset Operators:

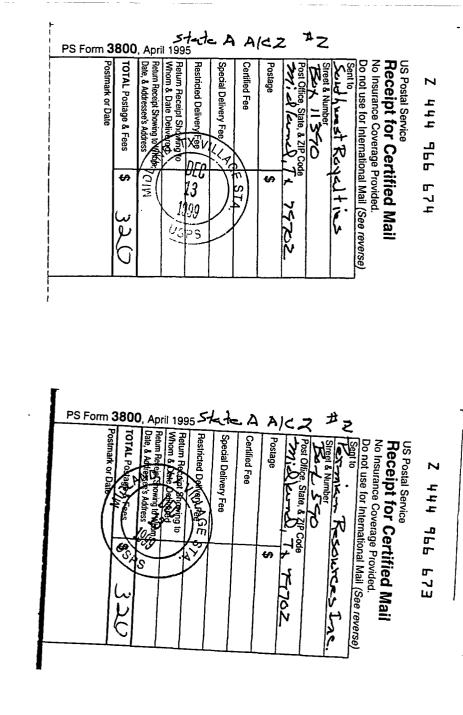
Chevron U S A Inc Attn: WOJV-Business Unit P.O. Box 1635 Houston, TX 77251

Conoco Inc 10 Desta Dr., Suite 100W Midland, TX 79705

Permian Resources Inc P.O. Box 590 Midland, TX 79702

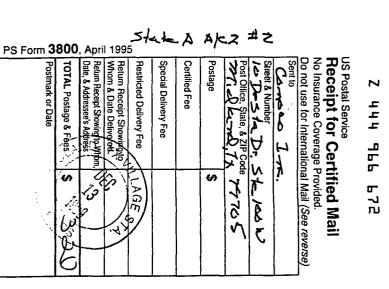
Southwest Royalties Inc P.O. Box 11390 Midland, TX 79702

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



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April	Return Receipt Showing to Whom, Date, & Addressee's Address	X Son	
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PS Form 3800, April 1995 State A	Postmark or Date	\$ 94 3 3 3 49 (1)	



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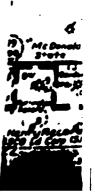
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Chevron USA Comoco Inc Permian Resources Southwest Royalties



District I PO Box 1980. Hobbs. NM 88241 1980 District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV PO Box 2088, Santa Fe, NM 87504-2088 State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

Form C-101 Revised February 10. 1994 Instructions on back Submit to Appropnate District Offico State Lease - 6 Copies Fee Lease - 5 Copies

____AMENDED REPORT

APPLICATION FOR PERMIT TO DR1LL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

								,		10		
Raptor Resources, Inc. 162791							DGRID No_ 162791					
	Grande										API Number	
Austin, Tx. 78701 30 - 025-08791							25-08791					
' Prope	rty Code		Property Name 'Well No.									
24	671				Stat	e 'A' A/C 2					2	
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L				Bottom	Hole Locat		eren			Nesi	Lea	
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" Work T	ype Code		" Well Type	e Code	" Cable/	/Rotary		" Lease type Co	de	14 Gro	Fround Level Elevation	
F			G		R			S				
16 M	ultiple		17 Proposed	Depth	18 For	mation		19 Contractor			20 Spud Date	
					Yates/7	7 Rvrs						
			2	Propos	ed Casing a	nd Cement	t Pro	gram				
Hole Si	ze	Cas	ing Size		ng weight/foot	Setting D		<u> </u>	f Cemen	t	Estimated TOC	
				1			P**** (2					
				1								
											. 17 Minimeter	
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Describe the p	roposed pro	ogram. If thi	s applicatior	is to DEEPI	EN or PLUG BACH	K give the data c	on the p	present productiv	e zone a	ind propos	ed new productive	
zone. Describe	the blowou	st prevention	n_program, i	f anyUse ad	ditional sheets if n	necrssary.		·		• •	•	
Current Stati	us: Shut	-in in the	Eunice; 3	Seven Kive	ers-Queen, Sou	ıth						
PROPOSEI	OPERA	TIONS									1	
			ce; Seven	Rivers-Q	ueen perfs							
		a) 3127 -	- 3320, &	the 7 Rvrs	s @ 3320 - 368	30						
3. Acidize												
4. Frac												
5. POP												
23 I hereby cenif	fy that the in	formation g	iven above is	true and comp	plute to the best		T O		71.01		~~~~	
of my knowledge and belief.						01L CONSERVATION DIVISION					SION	
Signature:	Eir 7	K. X	each	·Ang	A	Approved by:						
Printed name:		Bill R.	Keathly		Ті	Title:						
Title:	R egu			antor	A	Approval Date: Expiration Date:						
R egulatory Agent for Raptor Date: Phone						Conditions of Approval:						

Attached

(915) 697-1609

12-10-99

District I PO Box 1980, Hobbs. NM 88241-1980

A 14

2

District II PO Drawer DD, Artesia, NM 88211-0719 District III 1000 Rio Brazos Rd. Aztec, NM 87410 District IV PO Box 2088, Santa Fe. NM 87504-2088

State of New Mexico Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088 Revised February 21, 1994 instructions on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

	API Number 30-025-08791			2 Pool (79240		3 Pool Name Jalmat, Tnsl, Yts, 7-Rivers (Pro Gas)				
4 Property	Code	1		19240	5 Prope	erty Name	u, 11151, 115, 7-1	Kivers (Pro		ell Number
24671 7 OGRID No		-	_	State 'A' A/C 2 2					2	
16279		Rante	or Resou	irces, Inc		8 Operator Name 9 Elevation				
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UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West	line	County
12 Dedicated Acre	13 Join	t or Infii 14	Consolidatio	on Code 15	Order No.				-	
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44	1980		46		34 1980	1750	I hereby cert was plotted f or under my correct to th Date of Surv Signature an	tify that the wel rom field notes supervision, a e best of my be	ll locatie of actua nd that i linf.	FIFICATION on shown on this plat il surveys made by me the same is true and Surveyor:
			5	-	J.	teo	Certificate N	lumber		

Form C-102

STATE OF NEW MEXICO ENERGY, MINERALS, AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE NO. 12679 ORDER NO. R-11643

APPLICATION OF RAPTOR RESOURCES, INC. FOR TWO UNORTHODOX INFILL GAS WELL LOCATIONS AND SIMULTANEOUS DEDICATION, LEA COUNTY, NEW MEXICO.

ORDER OF THE DIVISION

BY THE DIVISION:

This case came on for hearing at 8:15 a.m. on June 14, 2001, at Santa Fe, New Mexico, before Examiner David R. Catanach.

NOW, on this <u>27th</u> day of August, 2001, the Division Director, having considered the testimony, the record, and the recommendations of the Examiner,

FINDS THAT:

(1) Due public notice has been given, and the Division has jurisdiction of this case and its subject matter.

(2) Division Cases No. 12678 and 12679 were consolidated at the hearing for the purpose of testimony.

(3) The applicant, Raptor Resources, Inc. ("Raptor"), seeks an exception to the well location and well density provisions currently governing the Jalmat (Tansill-Yates-Seven Rivers) Gas Pool for the following-described wells in Section 5, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico:

Well Name & Number	API Number	Well Location
State "A" A/C-2 No. 78	30-025-34910	1980' FNL & 660' FWL (Unit E)
State "A" A/C-2 No. 81	N/A	2080' FSL & 1980' FWL (Unit K)

Case No. 12679 Order No. R-11643 Page 2

(4) These wells are to be dedicated to an existing non-standard 440.50-acre Jalmat Gas Pool gas proration unit comprising Lots 3 and 4, and the S/2 NW/4, SW/4, W/2 SE/4 and SE/4 SE/4 of Section 5.

(5) The applicant also seeks authority to simultaneously dedicate the subject non-standard gas proration unit to its proposed State "A" A/C-2 Wells No. 78 and 81, and to the following-described existing wells:

Well Name & Number	API Number	Well Location
State "A" A/C-2 No. 2	30-025-08791	1980' FSL & 660' FWL (Unit L)
State "A" A/C-2 No. 27	30-025-08789	660' FSL & 660' FEL (Unit P)
State "A" A/C-2 No. 33	30-025-08793	660' FSL & 1980' FEL (Unit O)
State "A" A/C-2 No. 34	30-025-08794	1980' FSL & 1980' FEL (Unit J)
State "A" A/C-2 No. 44	30-025-08797	1980' FNL & 1980' FWL (Unit F)
State "A" A/C-2 No. 46	30-025-08800	660' FSL & 1980' FWL (Unit N)
State "A" A/C-2 No. 47	30-025-08798	660' FNL & 1980' FWL (Unit C)

(6) The subject non-standard gas proration unit was initially established by Division Order No. R-9073 dated December 14, 1989. This order further authorized the simultaneous dedication to this unit of the State "A" A/C-2 Wells No. 27, 41 and 44, all located at unorthodox gas well locations.

(7) By Division Order No. NSP-1636(SD)(L) dated September 19, 1991, a 400.50-acre non-standard gas proration unit in the Jalmat Gas Pool was established comprising Lots 3 and 4, and the S/2 NW/4, SW/4 and W/2 SE/4 of Section 5. This order further authorized the simultaneous dedication to this unit of the State "A" A/C-2 Wells No. 33, 41, 44 and 47, all located at unorthodox gas well locations.

(8) By Division Order No. NSP-1636-A(L)(SD) dated July 18, 2000, a 440.50-acre non-standard gas proration unit in the Jalmat Gas Pool was established comprising Lots 3 and 4, and the S/2 NW/4, SW/4, W/2 SE/4 and SE/4 SE/4 of Section 5. This order further authorized the simultaneous dedication to this unit of the State "A" A/C-2 Wells No. 2, 33, 34, 41, 44, 46 and 47, all located at unorthodox gas well locations.

(9) Division records demonstrate that the State "A" A/C-2 Well No. 41 was plugged and abandoned on December 28, 1994.

(10) The rules and procedures currently governing the Jalmat Gas Pool include, but are not necessarily limited to:

- (a) the "Special Rules and Regulations for the Jalmat Gas Pool," as promulgated by Division Order No. R-8170, as amended;
- (b) Division Rule 605.B.;
- (c) Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999;
- (d) Rule 1207.A.(2); and
- (e) the amended Stipulated Declaratory Judgement of the First Judicial District Court in Santa Fe, New Mexico issued on July 11, 2001 in <u>Hartman vs Oil</u> <u>Conservation Division</u>, Cause No. D-0101-CV-9902927 ("Amended Stipulated Declaratory Judgement").

(11) Division records demonstrate that Raptor originally filed an administrative application dated January 30, 2001, to recomplete its State "A" A/C-2 Well No. 78 to the Jalmat Gas Pool at an unorthodox gas well location, and to simultaneously dedicate this well to the subject 440.50-acre non-standard gas proration unit.

(12) No action was taken by the Division on this administrative application pursuant to certain provisions contained within the original Stipulated Declaratory Judgement of the First Judicial District Court in Santa Fe, New Mexico issued on January 4, 2001 in <u>Hartman vs Oil Conservation Division</u>, Cause No. D-0101-CV-9902927 ("Stipulated Declaratory Judgement").

(13) The Amended Stipulated Declaratory Judgement provided greater flexibility to the Division to approve these types of applications, and as a result, Raptor's original administrative application was approved by Division Order No. NSL-4615(SD) dated July 27, 2001.

(14) That portion of Raptor's application to recomplete its State "A" A/C-2 Well No. 78 to the Jalmat Gas Pool at an unorthodox gas well location, and to simultaneously dedicate this well to the subject 440.50-acre non-standard gas proration unit should be dismissed.

(15) The evidence presented in this case demonstrates that:

(a) there is substantial geologic discontinuity in the Yates and Seven Rivers formations within the Jalmat Gas Pool underlying Section 5 in which Raptor proposes to drill its State "A" A/C-2 Well No. 81;

(b) modern well logs and well completion techniques provide Raptor the opportunity to identify, perforate, stimulate and produce sands in the Yates and Seven Rivers formations that may not have been produced in older offset wells;

(c) with the exception of certain well recompletions Raptor has accomplished recently, most of the wells offsetting the proposed State "A" A/C-2 Well No. 81 are producing at marginal rates from the Jalmat Gas Pool;

(d) by drilling the State "A" A/C-2 Well No. 81, Raptor expects to recover at least 0.5 BCF of gas from the subject proration unit that may otherwise not be recovered by the existing wells, thereby preventing waste;

- (e) the State "A" A/C-2 Well No. 81 can be economically drilled to recover the incremental gas reserves underlying the subject gas proration unit; and
- (f) the proposed unorthodox gas well location for the State "A" A/C-2 Well No. 81 is necessary due to geologic and engineering considerations, and will provide Raptor the best opportunity to recover incremental gas reserves from the Jalmat Gas Pool underlying the subject gas proration unit.

(16) All Jalmat Gas Pool operators within the eight-section area surrounding Section 5 were notified of Raptor's application. No offset operator or interest owner appeared at the hearing in opposition to the application.

(17) Approval of the proposed unorthodox gas well location and simultaneous dedication will result in the recovery of hydrocarbons that will otherwise not be

Case No. 12679 Order No. R-11643 Page 5

recovered, thereby preventing waste, and will otherwise be in the best interest of conservation and protection of correlative rights.

IT IS THEREFORE ORDERED THAT:

(1) The applicant, Raptor Resources, Inc., is hereby authorized to drill its State "A" A/C-2 Well No. 81 at an unorthodox gas well location for the Jalmat Gas Pool 2080 feet from the South line and 1980 feet from the West line (Unit K) of Section 5, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico.

(2) A 440.50-acre non-standard gas proration unit comprising Lots 3 and 4, and the S/2 NW/4, SW/4, W/2 SE/4 and SE/4 SE/4 of Section 5, shall be simultaneously dedicated to the State "A" A/C-2 Well No. 81 and to the following-described existing Jalmat Gas Pool wells:

Well Name & Number	API Number	Well Location
State "A" A/C-2 No. 2	30-025-08791	1980' FSL & 660' FWL (Unit L)
State "A" A/C-2 No. 27	30-025-08789	660' FSL & 660' FEL (Unit P)
State "A" A/C-2 No. 33	30-025-08793	660' FSL & 1980' FEL (Unit O)
State "A" A/C-2 No. 34	30-025-08794	1980' FSL & 1980' FEL (Unit J)
State "A" A/C-2 No. 44	30-025-08797	1980' FNL & 1980' FWL (Unit F)
State "A" A/C-2 No. 46	30-025-08800	660' FSL & 1980' FWL (Unit N)
State "A" A/C-2 No. 47	30-025-08798	660' FNL & 1980' FWL (Unit C)
State "A" A/C-2 No. 78	30-025-34910	1980' FNL & 660' FWL (Unit E)
(A commented by Division	Order Ma MOT	1615(SD) dated July 27, 2001)

(As approved by Division Order No. NSL-4615(SD) dated July 27, 2001)

(3) That portion of Raptor's application to recomplete its State "A" A/C-2 Well No. 78, located at an unorthodox gas well location 1980 feet from the North line and 660 feet from the West line (Unit E) of Section 5, to the Jalmat Gas Pool, and to simultaneously dedicate this well to the subject 440.50-acre non-standard gas proration unit is hereby <u>dismissed</u>.

(4) Jurisdiction is hereby retained for the entry of such further orders as the Division may deem necessary.

Case No. 12679
Order No. R-11643
Page 6

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.



STATE OF NEW MEXICO OIL CONSERVATION DIVISION

nbery

LORI WROTENBERY Director