

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

**APPLICATION OF RAPTOR RESOURCES, INC.
FOR AN UNORTHODOX INFILL GAS WELL
LOCATION AND SIMULTANEOUS DEDICATION,
LEA COUNTY, NEW MEXICO.**

01 JUN -7 PM 3:25
2625
OIL CONSERVATION DIV.

CASE NO. 12625

AMENDED APPLICATION

RAPTOR RESOURCES, INC. ("Raptor"), through its undersigned attorneys, (i) seeks an exception to the well location requirements of the "Special Pool Rules and Regulations for the Jalmat Gas Pool", as promulgated by Division Order No. R-8170, as amended, for an unorthodox infill Jalmat Gas well location, and (ii) pursuant to the stipulated declaratory judgment issued by the First Judicial District Court in Santa Fe County, New Mexico on December 15, 2000, makes application for an order approving the simultaneous dedication of all Jalmat Gas Pool production to a standard 640-acre gas spacing and proration unit comprising Section 11, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico, and in support of its application states:

1. Raptor is the operator of a standard gas spacing and proration unit in the Jalmat Gas Pool comprised of Section 11, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico to which are currently dedicated the following wells:

- (A) State "A" A/C-2 Well No. 14 (API No. 30-025-08873), located at an unorthodox location 660 feet from the North and 1980 feet from the East line (Unit B) of Section 11;

- (B) State "A" A/C-2 Well No. 15 (**API No. 30-025-08874**), located at an unorthodox gas well location 660 feet from the North line and 1980 feet from the West line (Unit C) of Section 11;
- (C) State "A" A/C-2 Well No. 18, located at a standard location 1650 feet from the North and East lines (Unit G) of Section 11 which is currently plugged and abandoned;
- (D) State "A" A/C-2 Well No. 36 (**API No. 30-025-08878**), located at an unorthodox location 660 feet from the South and West lines (Unit M) of Section 11;
- (E) State "A" A/C-2 Well No. 42 (**API No. 30-025-08879**), located at an unorthodox location 1980 feet from the North line and 660 feet from the East line (Unit H) of Section 11;
- (F) State "A" A/C-2 Well No. 62 (**API No. 30-025-25542**), located at a standard gas well location 1980 feet from the South line and 2310 feet from the West line (Unit K) of Section 11;
- (G) State "A" A/C-2 Well No. 73 (**API No. 30-025-30035**), located at an unorthodox gas well location 990 feet from the South line and 660 feet from the East line (Unit P) of Section 11; and
- (H) State "A" A/C-2 Well No. 75 (**API No. 30-025-34791**), located at an unorthodox gas well location 2040 feet from the South line and 660 feet from the West line (Unit L) of Section 11.

2. Raptor proposes to drill the following two infill Jalmat Gas Wells on this spacing and proration unit:

- (A) The State "A" A/C Well No. 79 to be drilled at an unorthodox infill gas well location 660 feet from the North and West lines of said Section 11, and
- (B) The State "A" A/C-2 Well No. 80 to be drilled at a standard location 1980 feet from the North and West lines (Unit F).

3. The proposed location for the State "A" A/C-2 Well No. 79 is unorthodox for the "Special Rules and Regulations for the Jalmat Gas Pool", promulgated by Division Order No. R-8170, as amended, provide that wells located on a 640-acre spacing unit must be located no closer than 990 feet from the outer boundary of the unit.

4. Raptor seeks to simultaneously dedicate the Jalmat production from each of its proposed new infill gas wells and the existing Jalmat gas wells to this standard 640-acre Jalmat gas spacing and proration unit.

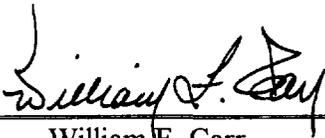
5. Raptor's proposed infill gas wells are necessary to efficiently and economically drain the subject 640-acre spacing and proration unit.

6. Approval of this application will be in the best interest of conservation, the prevention of waste and the protection of correlative rights.

WHEREFORE, Raptor Resources, Inc. requests that this application be set for hearing before an examiner of the Oil Conservation Division on March 22, 2001 and that, after notice and hearing as required by law and the rules of the Division, this application be granted.

Respectfully submitted,

HOLLAND & HART LLP
AND
CAMPBELL & CARR

By: 
William F. Carr

ATTORNEYS FOR RAPTOR RESOURCES, INC.

EXHIBIT A

**State "A" A/C-2 Well No. 79
660' FNL & 660' FWL (Unit D)
Section 11, Township 22 South, Range 36 East, N.M.P.M.**

**State "A" A/C-2 Well No. 80
1980' FNL & 1980' FWL (Unit F)
Section 11, Township 22 South, Range 36 East, N.M.P.M.**

640-acre Standard Jalmat Gas Pool Spacing and Proration Unit

Arco Permian
Post Office Box 1610
Midland, Texas 79702-1610

Betwell Oil & Gas Company
Post Office Box 2577
Hialeah, Florida 33012

Chevron U.S.A., Inc.
Attention: WOJV-Business Unit
Post Office Box 1635
Houston, Texas 77251

Conoco, Inc.
10 Desta Drive, Suite 100W
Midland, Texas 79705

Finley Resources
1308 Lake Street, Suite 200
Ft. Worth, Texas 76102

Gruy Petroleum Management Company
Post Office Box 140907
Irving, Texas 75014-0907

Marathon Oil Company
Mid-Continent Production Office
Post Office Box 552
Midland, Texas 79702

OXY Permian
Post Office Box 50250
Midland, Texas