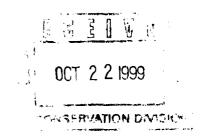
DOYLE HARTMAN

Oil Operator 500 NORTH MAIN P.O. BOX 10426 MIDLAND, TEXAS 79702

(915) 684-4011 (915) 682-7616 FAX



October 21, 1999

Via Facsimile (915) 684-4508

Raptor Resources, Inc. 414 W. Texas, Suite 202 Midland, TX 79701

Attn: Bill R. Keathly Regulatory Agent

Via Facsimile (505) 827-8177

New Mexico Oil Conservation Division 2040 South Pacheco Santa Fe, NM 87505

Attn: Lori Wrotenbery, Director
Michael Stogner, Chief Hearing Officer

Re: Application for Unorthodox Gas Well Locations and Simultaneous Dedication

State "A" A/C 2 Well No. 30 1980' FNL and 660' FWL Section 9, T-22-S, R-36-E Lea County, New Mexico

State "A" A/C 2 Well No. 48 660' FNL and 1980' FEL Section 9, T-22-S, R-36-E Lea County, New Mexico

Ladies and Gentlemen:

Reference is made to Raptor Resources, Inc.'s (Raptor's) applications, dated October 4, 1999 and October 5, 1999, received October 12, 1999, for unorthodox well locations and simultaneous dedication of its State "A" A/C 2 Nos. 30 and 48 wells to a previously existing 480-acre Jalmat proration unit.

Since the closest of Raptor's two newly proposed wells is 3300' north of our State "H" lease, but also in recognition of the fact that a proration unit is defined as "...the area in a pool that can be efficiently and economically drained by one well, as determined by the commission (N.M. Stat., 1973 § 70-2-17 (B)) (emphasis added)...", we hereby wave any current objection to the two newly proposed completions, provided:

(1) In accordance with standard NMOCD regulations, all gas from wells situated on the subject 480-acre non-standard Jalmat proration unit is both separately and accurately metered, on a daily basis, from each individual Jalmat well, so that the <u>source</u> of the <u>multi-well</u> proration unit production can be accurately determined, and

New Mexico Oil Conservation Division October 21, 1999 Page 2

(2) It is understood that Doyle Hartman reserves the right to object to future applications for simultaneous dedication, if and/or when it becomes apparent that Raptor's proposed spacing is more dense that the drainage capability of an efficiently completed Jalmat well, thus (a) violating the correlative rights of offset leases, or (b) promoting waste by requiring the drilling and completion of an excessive number of wells, in order to counter drainage by Raptor.

Please <u>promptly</u> let us know if the conditions of our approval are acceptable to Raptor. If our conditions are not acceptable, this letter shall serve as Doyle Hartman's timely objection to Raptor's application.

Very truly yours,

DO	YLE HA	ARTMAN	IAON O	perator	
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Doyle Hartman

rcp

 $wp 7 \\corresp. dh \\nmocd-raptor-state. \\h$

AGREED AND ACCEPTED BY RAPTOR RESOURCES, INC.

By:	 	
Title:		
Date:		

cc: Via Facsimile (512) 478-4476 Raptor Resources, Inc. 901 Rio Grande (78701) P.O. Box 160430 Austin, Texas 78716-0430

Attn: Russell Douglass, President
Mike Nell, Vice President
Bill Keathly, Regulatory Agent

New Mexico Oil Conservation Division October 21, 1999 Page 3

Via Facsimile (505) 986-0741

Gallegos Law Firm 460 St. Michaels Drive, Building 300 Santa Fe, NM 87505 Attn: J.E. Gallegos

Michael J. Condon

DOYLE HARTMAN, Oil Operator (Dallas)

DOYLE HARTMAN, Oil Operator (Midland)

Don Mashburn Steve Hartman Sheila Potts Linda Land Cindy Brooks

RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

October 4, 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' FNL and 660' FWL
Section 9, T 22S, R 36E (E)
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. 30** in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool). It is our desire to also simultaneously dedicate the existing 480- acre Proration Unit assigned to our well nos.1, 29, 38, 40, 57, 63, 67 and 72 to all nine wells. Previously approved orders are R 9073 and NSL 2872 & 2872 A & B.

The offset operator plat shows that Arco Permian, Chevron Inc, OXY USA, Doyle Hartman, Marathon and Finley Resources 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 ajuno.com.

Sincerely.

Bill R. Keathly

Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

D OOYLE HARTMAN OIL OPERATOR

DECENTED

OCT 1 2 1999

State "A" A/C 2 # 30 Section 9, T-22S, R-36E, (E) API # 30-025-08855 Lea County, New Mexico

RE: Application for Unorthodox Location

Notification of Offset Operators:

Arco Permian P.O. Box 1610 Midland, TX 79702

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

OXY USA Inc P.O. Box 50250 Midland, TX 79710

Finley Resources 1308 Lake St., Ste 200 Ft. Worth, TX 76102

Doyle Hartman P.O. Box 10426 Midland, TX 79702

Marathon Oil Co. P.O. Box 552 Midland, TX 79702

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

Arco Permian

Doyle Hartman

Oxy

Finley Resources

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State of New Mexico Energy, Minerals & Natural Resources Department

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

OIL CONSERVATION DIVISION PO Box 2088

District IV	. Rd., A2.160,	NM 07410		Sant	a Fe, NM 87	/504-2088	,			Fee	: Lease - 5 Copie	
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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 87504-2038

Revised February 21, 19 instructions on ba Submit to Appropriate District Off State Lease - 4 Cop Fee Lease - 3 Cop

AMENDED REPOR

WELL LOCATION AND ACREAGE DEDICATION PLAT

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RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

October 5, 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' FNL and 1980' FEL Section 9, T 22S, R 36E (B) 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. 48** in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool). It is our desire to also simultaneously dedicate the existing 480- acre Proration Unit assigned to our well nos. 1, 29, 30, 38, 40, 57, 63, 67 and 72 to all ten wells. Previously approved orders are R 9073 and NSL 2872 & 2872 A & B.

The offset operator plat shows that Arco Permian, Chevron Inc, OXY USA, Doyle Hartman, Marathon and Finley Resources 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,

Bill R. Keathly

Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

OCOLEHAR MAN OCOPERATOR

OCT 12 1999

State "A" A/C 2 # 48 Section 9, T-22S, R-36E, (B) API # 30-025-08845 Lea County, New Mexico

RE: Application for Unorthodox Location

Notification of Offset Operators:

Arco Permian P.O. Box 1610 Midland, TX 79702

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

OXY USA Inc P.O. Box 50250 Midland, TX 79710

Finley Resources 1308 Lake St., Ste 200 Ft. Worth, TX 76102

Doyle Hartman P.O. Box 10426 Midland, TX 79702

Marathon Oil Co. P.O. Box 552 Midland, TX 79702

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

Arco Permie >

Chevron

Finley Resources

Der e Hartman

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District I PO Box 1980, Hobbs, NM 88241 1980

State of New Mexico
Energy, Minerals & Natural Resources Department

PO Drawer DD, Artesia, NM 88211-0719

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

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV				Sant	are, NIVI 8	/304-2088			Fee	Lease - 5 Copi	
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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 Eox 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, 19 instructions on b: Submit to Appropriate District Off State Lease - 4 Cop Fee Lease - 3 Cop

AMENDED REPO:

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