

Lori Wrotenbery, Director  
Michael Stogner, Chief Hearing Examiner  
New Mexico Oil Conservation Division  
October 29, 1999  
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excerpt from the herein enclosed *Statehouse Reporting Service* dated October 25, 1999 (Exhibit "D"). Hartman was not notified of the Raptor application, even though Hartman is an offset operator. Hartman has not consented to the application. Because Hartman was not given notice, Hartman did not have the opportunity to serve an objection to the application, which was apparently approved by Order NSL-2816-C(SD). Hartman did not discover issuance of this Order until October 27, 1999, upon receiving a copy of the October 25, 1999 issue of the *Statehouse Reporting Service*.

Because Hartman was not given notice, as required by Division rules and regulations, and because Hartman objects, we are asking the Division to withdraw Order NSL-2816-C(SD), and set the matter for hearing. If Raptor intends to pursue the application, the Division should require Raptor to justify the need for high-density infill Jalmat gas wells including a sufficient showing that the subject wells, when combined with Raptor's other existing and planned wells for Sections 8 and 9, will not cause waste nor violate correlative rights. Raptor should also be required to make a showing as to why it is necessary to perform essentially all of its Section 8 development work, on the eastern half of its 640-acre Jalmat gas proration unit consisting of Section 8, instead of uniformly spreading its new Jalmat gas completions throughout Section 8, as would be expected. A review of Exhibit "A" demonstrates Raptor's unprecedented high-density Jalmat infill drilling and recompletion program.

2. **State "A" A/C-2 Wells No. 4 and No. 32-Y:** From an examination of Exhibit "A", it can be seen that these wells, located in the SW/4 of Section 9, are the subject of proposed or recent workovers by Raptor. Hartman assumes that they are recompletions from the Eunice South Pool to the Jalmat Pool, and should have been the subject of an application for administrative approval for unorthodox locations and simultaneous dedication. Again, Hartman received no notice of such applications, although Hartman is an offset operator. Because Hartman received no required notice, and because Hartman presently objects to any non-standard location or request for simultaneous dedication for these wells, if any administrative approval has already been given for these wells, Hartman hereby requests that it be withdrawn and the matter set for hearing, if Raptor intends to pursue operation of these wells.

3. **State "A" A/C-2 Wells No. 54 and No. 77** On October 27, 1999, Hartman also became aware of the Application for Permit to Drill, Form C-101, for Well No. 77, and the Sundry Notice, Form C-103, for Well no. 54. Copies are attached as Exhibits "E" and "F". With respect to Well No. 54, Raptor has stated that the well will be completed over a vertical interval from 3331'-3700', but characterizes its proposed completion interval as being in the Eunice South Pool. If the Division will refer to its Geological Nomenclature Subcommittee Cross-Sections for the Jalmat and Eumont Pools (excerpt enclosed as Exhibit "G"), the Division will see that 80% of Raptor's proposed completion interval for the State "A" A/C-2 No. 54 well falls within the vertical limits of