

**DOYLE HARTMAN**

*Oil Operator*

3811 TURTLE CREEK BLVD., SUITE 202  
DALLAS, TEXAS 75219

(214) 520-1800  
(214) 520-0811 FAX

October 30, 1999

**VIA FACSIMILE: 512/478-4476**

**6 PAGES**

Raptor Resources, Inc.  
901 Rio Grande (78701)  
P.O. Box 160430  
Austin, TX 78716-0430  
Attn: Russell Douglass, President  
Mike Nell, Vice President

**VIA FACSIMILE : 915/684-4508**

Raptor Resources, Inc.  
414 W. Texas, Suite 202  
Midland, TX 79701  
Attn: Bill R. Keathly, Regulatory Agent

Re: Raptor's Dense-Spacing Infill Program  
Jalmat Gas Pool  
T-22-S & T-23-S, R-36-E  
Lea County, New Mexico

Gentlemen:

Reference is made to our letter of October 29, 1999, to Ms. Lori Wrotenbery and Mr. Michael Stonger of the New Mexico Oil Conservation Division, including our discussion corresponding to Raptor's proposed State "A" A/C-2 Nos. 54 and 77 completions located in the S/2 SE/4 Section 8, T-22-S, R-36-E.

After becoming aware of Raptor's C-103 for its proposed State "A" A/C-2 No. 54 recompletion, I have now had an opportunity to compare well logs with the C-101's that Raptor has filed for its State "A" A/C-2 Nos. 30 and 48 wells located in the NW/4 Section 9, T-22-S, R-36-E. It appears that Raptor has proposed the following completion intervals and pool designations for its Nos. 30, 48, and 54 wells.

NOV - 1 10:36  
OIL CONSERVATION DIV.

Messrs. Russell Douglass, Mike Nell and Bill Keathly  
October 30, 1999  
Page 2

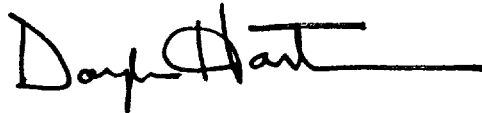
<u>Well</u>	<u>Proposed Pool Designation</u>	<u>Proposed Completion Interval</u>	<u>Top of Queen</u>	<u>Base of Jalmat</u>
State "A" A/C-2 No. 30	Jalmat	2955'-3679'	3680'	3580'
State "A" A/C-2 No. 48	Jalmat	2971'-3660'	3715'	3615'
State "A" A/C-2 No. 54	Eunice South	3331'-3700'	3740'	3640'

Based on the foregoing table, in addition to our strong objections to Raptor's proposed dense-spacing infill drilling and recompletion program in its Jalmat Pool acreage, we again respectfully suggest that Raptor refer to the NMOCD's *Stratigraphic Nomenclature Committee Cross-sections* for the Jalmat and Eumont Pools, and in particular to the log picks for Marathon's McDonald State No. 6 well situated in the SE/4 SW/4 Section 16, T-22-S, R-36-E, (N-16-22S-36E), which is located just south of Raptor's State "A" A/C-2 lease.

Our objections to Raptor's infill program notwithstanding, and considering that the above table corresponds to the first three Raptor logs that I have checked against Raptor's NMOCD filings, Raptor clearly needs to familiarize itself with Southeast New Mexico geology. While becoming familiar with Southeast New Mexico geology and with the subject reservoirs, Raptor may itself realize that its proposed dense-spacing infill program is not necessary in order to efficiently and economically drain its Jalmat acreage. However, at the present, Raptor has the cart before the horse, by rapidly launching into an unnecessary dense-spacing Jalmat infill program, without first becoming highly familiar with the geology, reservoirs, and past history of the Jalmat Pool.

After becoming familiar with Southeast New Mexico geology, we also strongly suggest that Raptor review and verify its log picks for the well completions that it has performed to date.

Very truly yours,



Doyle Hartman

DH/ao  
Enclosures

cc w/ enc.:

Messrs. Russell Douglass, Mike Nell and Bill Keathly  
October 30, 1999  
Page 3

**VIA FACSIMILE: 505/827-8177**

Lori Wrotenbery, Director  
Michael Stogner, Chief Hearing Examiner  
New Mexico Oil Conservation Division  
2040 South Pacheco  
Santa Fe, NM 87505

**VIA FACSIMILE: 505/393-0720**

NMOCD  
1625 N. French Drive  
Hobbs, NM 88240  
Attn: Chris Williams, Supervisor and Oil & Gas Inspector

**VIA FACSIMILE: 505/986-0741**

Gallegos Law Firm  
460 St. Michaels Drive, Bldg. 300  
Santa Fe, New Mexico 87505

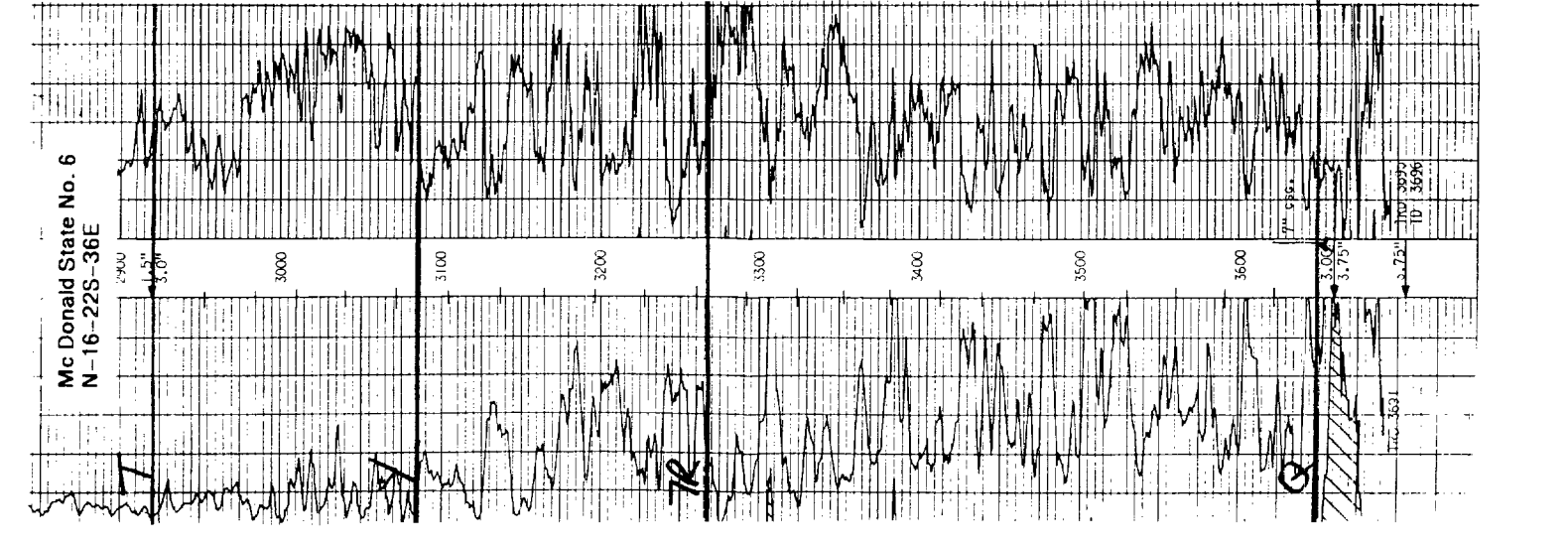
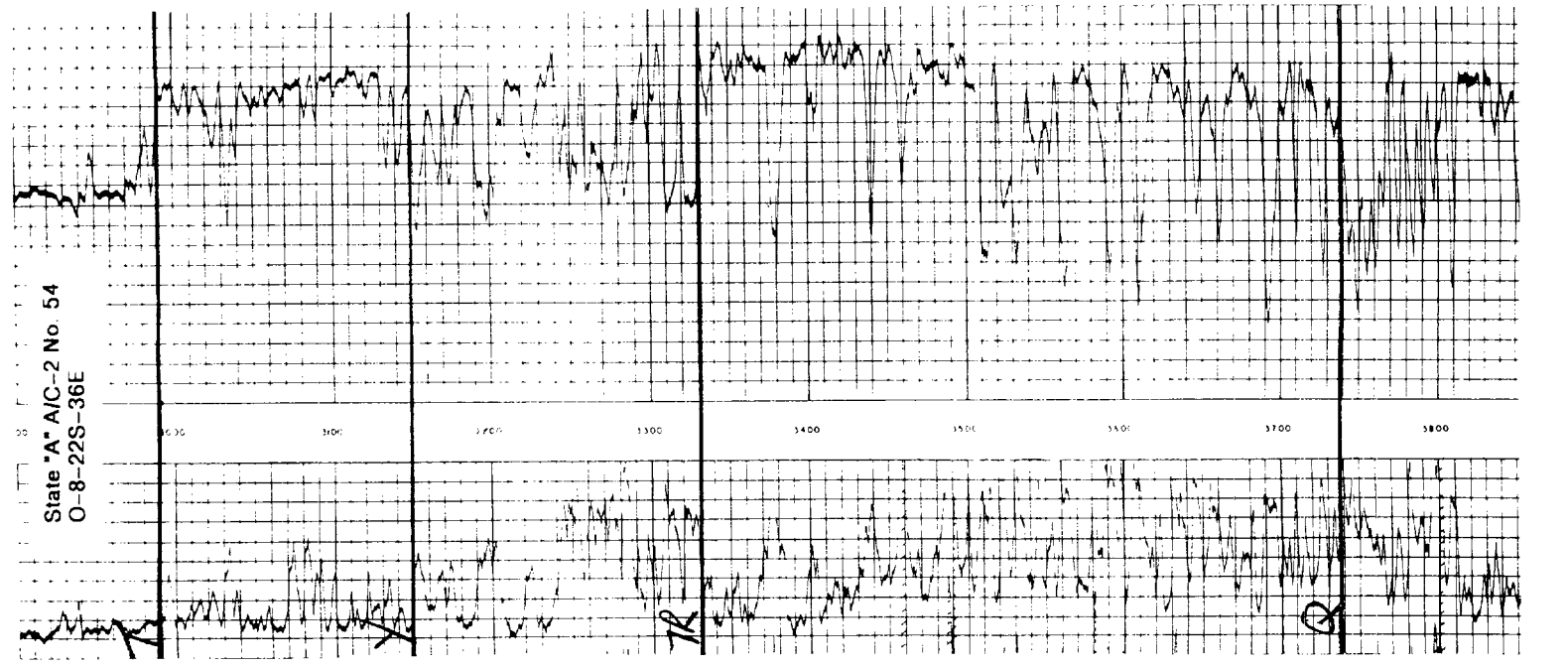
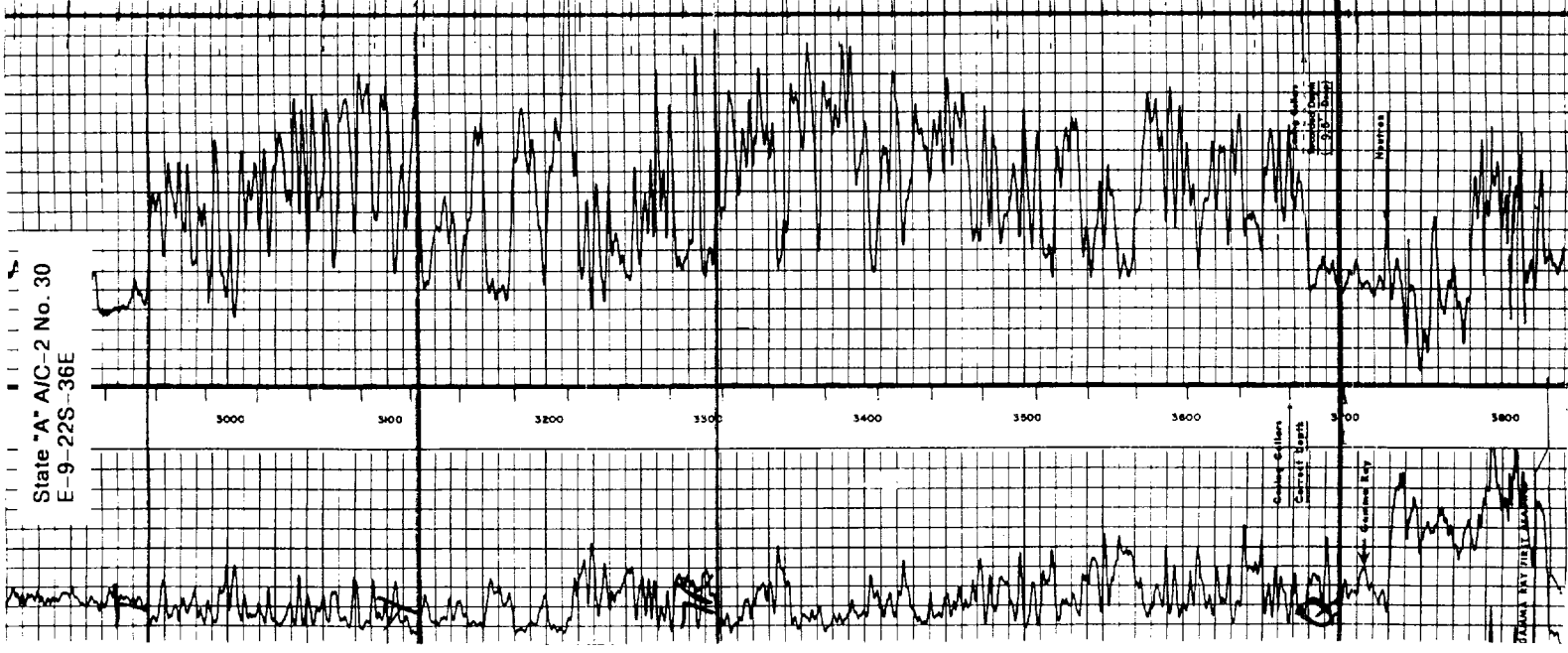
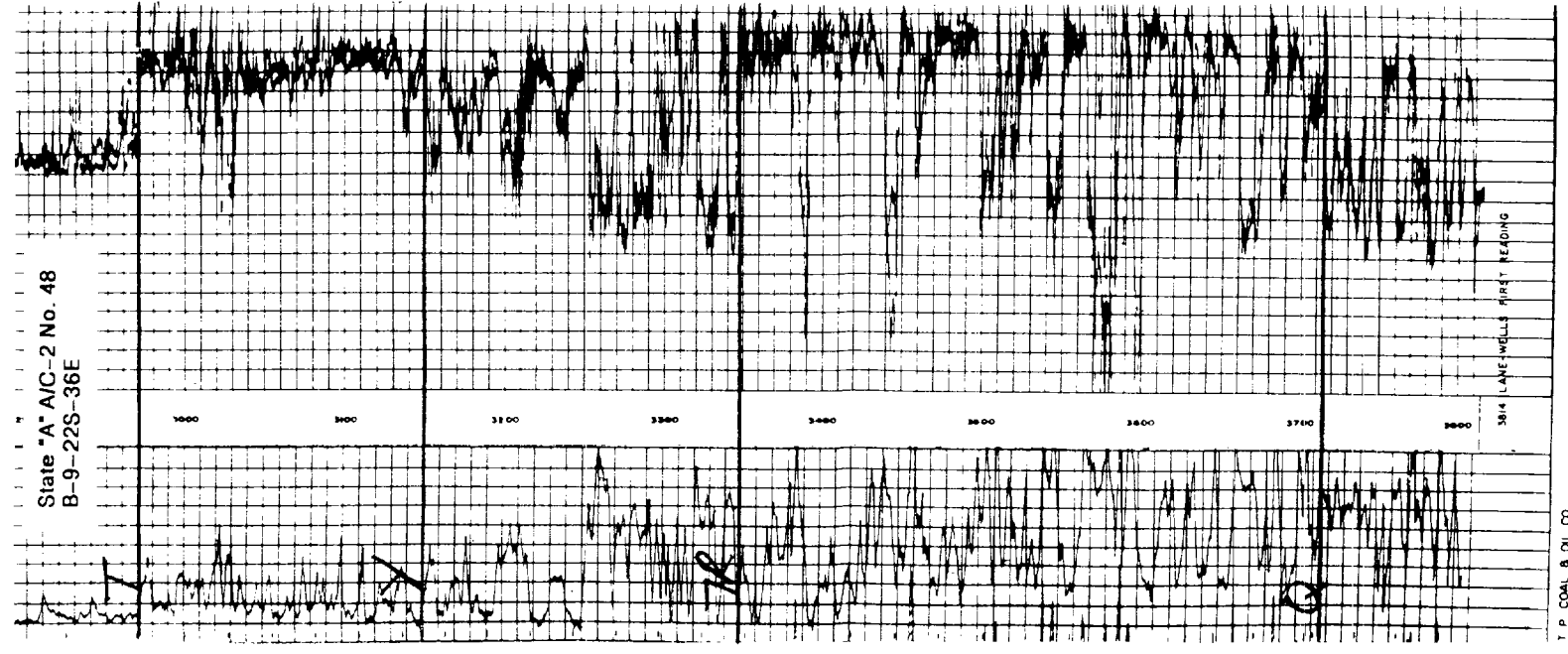
**VIA FACSIMILE: 915/682-6504**

James A. Davidson  
214 W. Texas, Suite 710  
Midland, TX 79701

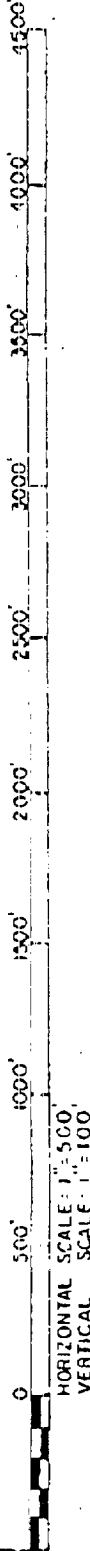
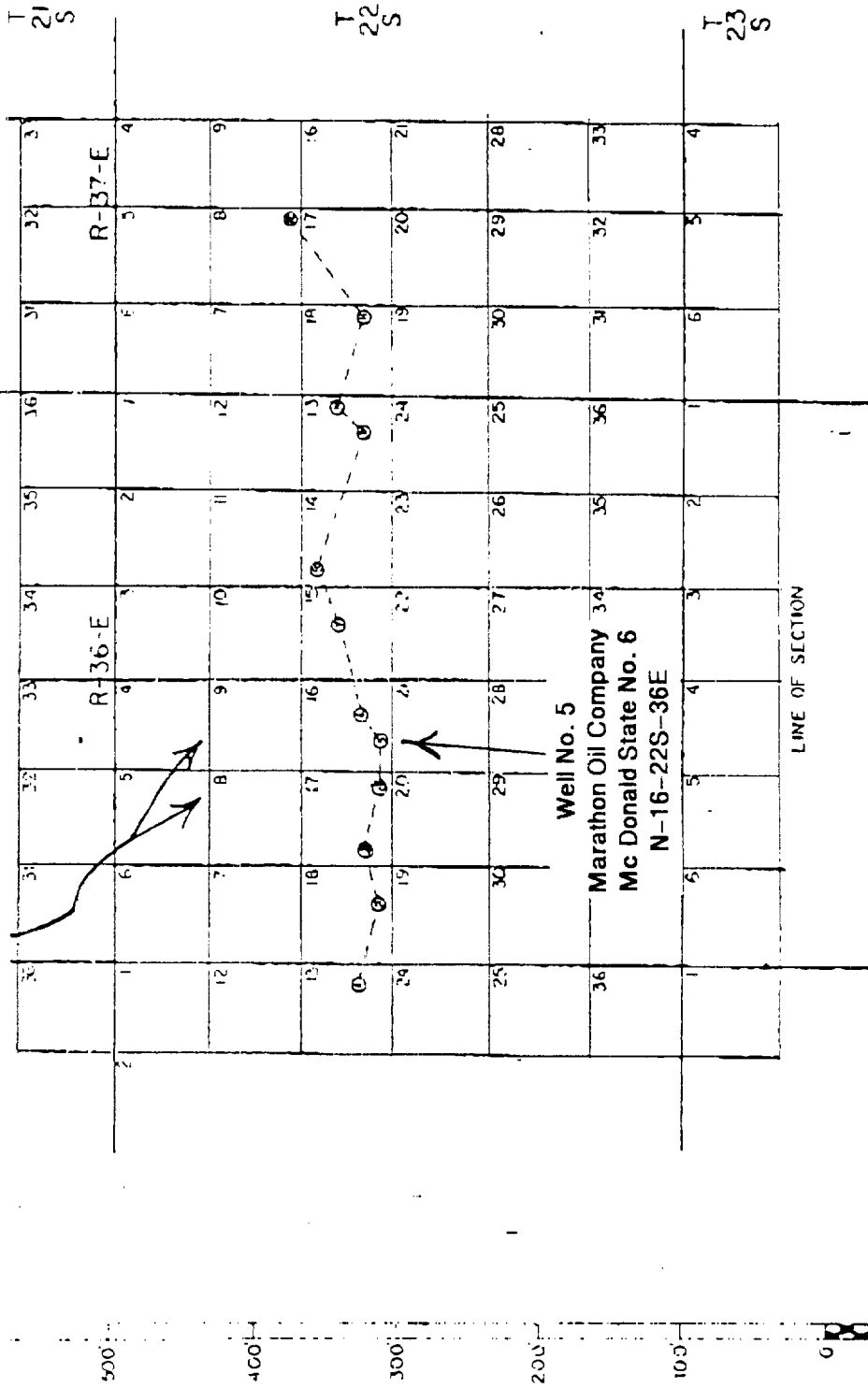
**DOYLE HARTMAN, Oil Operator (Dallas)**

**DOYLE HARTMAN, Oil Operator (Midland)**

Don Mashburn  
Steve Hartman  
Sheila Potts  
Linda Land  
Cindy Brooks



Raptor Resources, Inc.  
 State "A" A/C-2 Lease  
 Sections 8 & 9, T-22-S, R-36-E



5

OHIO

STATE McDONALD-6

N-16-22-36

EI 3850

6

OHIO

STATE McDONALD-3

J-16-22-36

EI 3562

