NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

October 13, 1999

Raptor Resources, Inc. P. O. Box 160430 Austin, Texas 78716-0430 Attention: Bill R. Keathly

Administrative Order NSL-2816-C (SD)

Dear Mr. Keathly:

Reference is made to the following: (i) your applications submitted to the New Mexico Oil Conservation Division ("Division") on September 23, 1999; and (ii) the Division's records in Santa Fe, including the files on Division Case No. 9775 and Administrative Orders NSL-2816 (SD), NSL-2816-A (SD), NSL-2816-B (SD), and SD-99-7: all concerning Raptor Resources, Inc.'s ("Raptor") request for two unorthodox Jalmat infill gas well locations within an existing standard 640-acre gas spacing and proration unit ("GPU") for the Jalmat Gas Pool comprising all of Section 8, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico. This 640-acre GPU was the subject of Division Order No. R-9073, issued in Case No. 9775 dated December 14, 1989 [Paragraph No. (3) of Exhibit "A"]. The following four described wells are currently dedicated to this unit:

- (1) State "A" A/C-2Well No. 3 (API No. 30-025-08829), located at a standard gas well location 1980 feet from the North and East lines (Unit G) of Section 8 (see Division Administrative Order SD-99-7 dated June 30, 1999);
- (2) State "A" A/C-2 Well No. 26 (API No. 30-025-08835), located at an unorthodox gas well location [approved by Division Administrative Order NSL-2816 (SD), dated June 28, 1990] 660 feet from the North line and 1980 feet from the East line (Unit B) of Section 8;
- (3) State "A" A/C-2 Well No. 43 (**API No. 30-025-08837**). located at an unorthodox gas well location (approved by Division Order No. R-9073) 1650 feet from the North line and 990 feet from the East line (Unit H) of Section 8; and
- (4) State "A" A/C-2 Well No. 70 (API No. 30-025-28279), located at an unorthodox gas well location [approved by Division Administrative Order NSL-2816-B (SD), dated April 21, 1992] 1295 feet from the South and East lines (Unit P) of Section 8.

It is our understanding that the two subject wells to be considered at this time are currently completed in the South Eunice-Seven Rivers-Queen Pool at standard oil well locations; however, both are to

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be plugged back and recompleted up-hole into the Jalmat Gas Pool upon issuance of this order.

By authority granted me under the provisions of Rule 2(d) of the "Special Rules and Regulations for the Jalmat Gas Pool", as promulgated by Division Order No. R-8170, as amended, and Division Rule 104.F (2) the following two described wells located at unorthodox Jalmat gas well locations, both in Section 8, are hereby approved:

State "A" A/C-2 Well No. 24 1980' FSL & 660' FEL (Unit I) (API No. 30-025-08833)

State "A" A/C-2 Well No. 25 660' FN & EL (Unit A) (API No. 30-025-08834)

Also. Raptor is hereby authorized to simultaneously dedicate Jalmat gas production from the State "A" A/C-2 Wells No. 24 and 25 with the State "A" A/C-2 Wells No. 3, 26, 43, and 70. Furthermore, Raptor is hereby permitted to produce the allowable assigned the subject 640-acre GPU from all six of the above-described wells in any proportion

All provisions that are applicable to the subject GPU in Division Order No. R-9073 and Division Administrative Orders NSL-2816 (SD), NSL-28162-A (SD), NSL-2816-B (SD), and SD-99-7 and not in conflict thereto shall remain in full force and affect until further notice.

Jurisdiction of this matter shall be further retained for the entry of any such subsequent orders, as the Division may deem necessary.

Sincerely,

Lori Wrotenbery

Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Hobbs

New Mexico State Land Office - Santa Fe

File: NSL-2816 (SD) NSL-2816-A (SD)

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NSL-2816-B (SD)

SD-99-7