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

Lea County, New Mexico

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) Page 12504

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 <u>a juno.com</u>.

Sincerely,

Bill R. Keathly

Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

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.