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Top Stories

Regulators around globe watch Hutchinson, Kan., gas leak incident

Sam Fletcher
OGJ Online

HOUSTON, Mar. 1 Natural gas that apparently escaped from an underground salt storage unit and erupted in Hutchinson, Kan., killing two residents, has put a solution mining operation on hold in the UK and prompted German regulators to seek more information on such activity, an industry consultant said Thursday.

This really catches a lot of people's attention. There has never been a failure of a gas storage cavern before, said Joe L. Ratigan, with Houston-based Sofregaz US Inc., who represented Hutchinson at a hearing by the Kansas Senate Utilities Committee earlier this week.

It should prompt the Kansas Department of Health and Environment (KDHE) to toughen its lax regulation of underground storage facilities in that state, and may prompt other states to rework theirs, he said.

New York has been working for 3 years on a state regulation for hydrocarbons storage caverns but [it] is not yet complete. Louisiana has been working 3-4 years on its regulation, Ratigan said Thursday.

New York's proposed regulation is still in draft form, while Louisiana issued a statewide order governing storage caverns in 1977, following a fire at the West Hackberry site of the Strategic Petroleum Reserve that was finally quelled by the Boots & Coots Inc. wild well control firm. Although it has hydrocarbon storage caverns, Oklahoma has no rule specifically regulating gas storage, Ratigan said.

Hutchinson background

While there has been no official finding yet, the working assumption is that the Jan. 17-18 eruptions of gas and brine in 30-ft geysers in Hutchinson resulted from the loss of 73 MMcf of gas from the Yaggy storage facility 7 miles downip from the central Kansas community of 40,000 people (OGJ Online, Feb. 21, 2001).

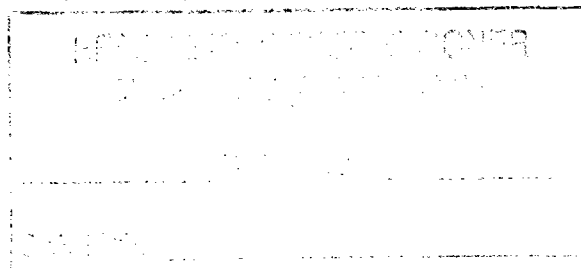
The gas is thought to have escaped through a fist-size hole in the casing of an injection well that was drilled out in 1992 to convert the former propane storage facility into a gas storage unit.

KDHE officials earlier reported the fingerprint of gas venting in Hutchinson matched the gas in storage at Yaggy. That facility is operated by Kansas Gas Service Co., a division of Oneok Inc., Tulsa, which provides gas to 660,000 customers in Kansas and northeast Oklahoma.

Hutchinson officials met Thursday with representatives of Kansas Gas Service, KDHE, and the Kansas Geological Survey a research division of the University of Kansas to assess the

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problem.

At this point, the danger of spontaneous eruptions has passed, a KDHE spokesman told OGD Online. As more shallow pockets of gas within the town have been drilled and flared, he said, the volume and pressure of new gas discoveries have decreased. We're confident that the explosion and fire hazard has passed.

So far, 49 sites have been or are being drilled in and around Hutchinson in search of deposits of migrating gas primarily 285-400 ft underground. Officials reported low flows of gas are still being flared at nine of those sites, while two others encountered gas but are not flaring.

The city very much wants to know that all of the escaped gas has been found and flared. The people of Hutchinson will not be confident unless they know all of the migration paths between the city and Yaggy have been determined and are monitored or plugged, said Lee Allison, state geologist and director of the Kansas Geological Survey.

Migration pattern unknown

However, geologists still don't know along what route the escaping gas migrated. Members of the Kansas Geological Survey said two seismic surveys in early February at first indicated a possible subsurface sand channel through which the escaping gas could flow up from the storage facility.

But that hasn't been borne out by a study of area well logs or the 22% success rate in drilling for suspected gas pockets, Allison told OGD Online.

Survey members are now looking for possibly extensive fractures in silt deposits on top of the Wellington Shale that overlies and is mixed with the Hutchinson bedded salt that housed the Yaggy storage caverns.

Geologists hope to collect more information soon. They're now drilling a fourth well along our earlier seismic line and we hope to core down to the Hutchinson salt through the interval that we think carried the gas, Allison said.

There are more than 600 NGL/LPG salt storage caverns in Kansas, the most of any state. Kansas also has more natural gas storage caverns, although Gulf Coast salt dome caverns are 10-20 times bigger than the typical Kansas unit, Ratigan said.

Unlike the salt domes in Alabama, Mississippi, and Louisiana, the only salt formations in Kansas, Oklahoma, Ohio, Michigan, New York, and Pennsylvania are bedded salt layers of salt intermixed with layers of other rocks. Texas is the only state with both bedded salt and salt domes at useable depths for underground storage, said Ratigan.

Regulation problems

The mix of bedded salt and permeable rock formations around Hutchinson one of the first US sites for solution salt mining in the late 1800s is just one of the problems the KDHE did not address in its regulation of underground storage facilities, Ratigan told state legislators Tuesday.

Some of the many unplugged brine wells that were long ago drilled and abandoned within Hutchinson apparently helped route the escaping gas to the surface. Moreover, Ratigan said, the fracture gradient of the nonsalt rock must be determined to establish a safe pressure for a gas storage cavern.

But KDHE's rules were promulgated before there were any gas storage caverns in Kansas. As a result, he said, the Kansas rules do not:

Require a mechanical integrity test (MIT) for injection wells at salt storage facilities, although it does require such tests for brine mining wells. Most states require MITs of storage wells on a 5-year frequency, and many require testing when wellheads or cemented casings are modified, said Ratigan.

Require any casing inspection log, nor does it address reentry or drilling out plugged and abandoned wells.

Address how close storage caverns can be to each other. This is perhaps not a major issue with liquid wells but is important for gas storage caverns, Ratigan said.

Require emergency shutdown valves at the wellhead, as is common in other states.

Require cathodic protection for wells.

Require as much information to be reported by storage cavern operators as to other states.

Although Kansas has more storage wells and caverns than any other state, it does not have the largest regulatory and enforcement staff or the largest budget. Clearly, that may be the biggest change required at KDHE, Ratigan told legislators.



Louisiana's regulatory agency employs nine professional engineers to police some 4,500 underground storage wells, while the Texas agency has two professionals regulated 950. It is my understanding that KDHE employs two professionals who are responsible for regulating more than 6,000 wells, Ratigan said.

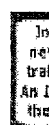
Kansas should develop three separate sets of regulations for solution mining of salt, for NGL/LPG storage, and for natural gas storage as they do in Texas, Ratigan said. There is an uniqueness to each industry that needs to be addressed.

A KDHE spokesman told OGJ Online that agency is already looking at strengthening its regulations and is considering possible action against Kansas Gas Service. He said some civil suits have already been filed against the company as a result of the mishap.

Meanwhile, he said, We are still working on a plan to relocate some residents.

Contact Sam Fletcher at Samf@ogjonline.com





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Oil & Gas Journal
April 9, 2001

Effects of Hutchinson, Kan., gas leak can be worldwide

A January uncontrolled escape of natural gas and brine from an underground salt storage cavern is having worldwide consequences for underground hydrocarbon storage operations, OGJ Online reported last month.

The gas apparently escaped from underground storage and erupted in Hutchinson, Kan., killing two residents. The incident put a solution mining operation on hold in the UK and prompted German regulators to seek more information on such activity, according to Joe L. Ratigan, of Sofregaz US Inc., Houston. He spoke as representative of Hutchinson at a hearing by the Kansas Senate Utilities Committee in March.

"This really catches a lot of people's attention. There has never been a failure of a gas storage cavern before," said Ratigan.

It should prompt the Kansas Department of Health and Environment (KDHE) to toughen its "lax" regulation of underground storage facilities in that state and may prompt other states to rework theirs.

New York and Louisiana have each been working for 3 years or longer on a state regulation for hydrocarbons storage caverns, but [it] is "not yet complete," said Ratigan.

New York's proposed regulation is still in draft form, while Louisiana issued a statewide order governing storage caverns, following a fire at the West Hackberry site of the Strategic Petroleum Reserve that was finally quelled by the Boots & Coots Inc. wild well control firm.

Although it has hydrocarbon storage caverns, Oklahoma has no rule specifically regulating gas storage, Ratigan said.

Hutchinson background

The "working assumption," as of mid-March, was that the Jan. 17-18 eruptions of gas and brine in 30-ft geysers in Hutchinson resulted from the loss of 73 MMcf of gas from the Yaggy storage facility 7 miles down from the central Kansas community of 40,000 people (OGJ Online, Feb. 21, 2001).

Oneok Inc., Tulsa, owns and operates the Yaggy field.

The gas likely escaped through "a fist-size hole" in the casing of an injection well that was drilled out in 1992 to convert the former propane storage facility into a gas storage unit.

KDHE officials earlier reported the "fingerprint" of gas venting in Hutchinson matched the gas in storage at Yaggy. That facility is operated by Kansas Gas Service Co., a division of Oneok Inc., Tulsa, which provides gas to 660,000 customers in Kansas and northeast Oklahoma.

By mid-March, 49 sites had been or were being drilled in and around Hutchinson in search of deposits of migrating gas primarily 285-400 ft underground. Officials reported "low flows" of gas are still being flared at nine of those sites, while two others encountered gas but are not flaring.

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Migration pattern

Geologists still don't know, however, along which route the escaping gas migrated. Members of the Kansas Geological Survey said two seismic surveys in early February at first indicated a possible subsurface sand channel through which the escaping gas could flow up from the storage facility.

But that hasn't been borne out by a study of area well logs or the 22% success rate in drilling for suspected gas pockets, Allison told OGJ Online.

Survey members are now looking for possibly extensive fractures in silt deposits on top of the Wellington Shale that overlies and is mixed with the Hutchinson bedded salt that housed the Yaggy storage caverns.

There are more than 600 NGL-LPG salt storage caverns in Kansas, the most of any state. Kansas also has more natural gas storage caverns, although Gulf Coast salt dome caverns are 10-20 times bigger than the typical Kansas unit, Ratigan said.

Unlike the salt domes in Alabama, Mississippi, and Louisiana, the only salt formations in Kansas, Oklahoma, Ohio, Michigan, New York, and Pennsylvania are bedded salt-layers of salt intermixed with layers of other rocks.

Texas is the only state with both bedded salt and salt domes at useable depths for underground storage, he said.

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The mix of bedded salt and permeable rock formations around Hutchinson—one of the first US sites for solution salt mining in the late 1800s—is just one of the problems the KDHE did not address in its regulation of underground storage facilities, Ratigan told state legislators.

Some of the many unplugged brine wells that were long ago drilled and abandoned within Hutchinson apparently helped route the escaping gas to the surface. Moreover, Ratigan said, the fracture gradient of the nonsalt rock must be determined to establish a safe pressure for a gas storage cavern.

But KDHE's rules were promulgated before there were any gas storage caverns in Kansas. As a result, he said, the Kansas rules do not:

- Require a mechanical integrity test (MIT) for injection wells at salt storage facilities, although it does require such tests for brine mining wells. Most states require MITs of storage wells on a 5-year frequency, and many require testing when wellheads or cemented casings are modified, said Ratigan.
- Require any casing inspection log, nor do they address re-entry or drilling out plugged and abandoned wells.
- Address how close storage caverns can be to each other, a major issue for gas storage caverns, Ratigan said.
- Require emergency shutdown valves at the wellhead, as is common in other states.
- Require cathodic protection for wells.
- Require as much information to be reported by storage cavern operators as to other states.

Although Kansas has more storage wells and caverns than any other state, it does not have the largest regulatory and enforcement staff or the largest budget. "Clearly, that may be the biggest change required at KDHE," Ratigan told legislators.

Louisiana's regulatory agency employs nine professional engineers to police some 4,500 underground storage wells, while the Texas agency has two professionals to regulate 950. "It is my understanding that KDHE employs two professionals who are responsible for regulating more than 6,000 wells," Ratigan said.

Kansas should develop three separate sets of regulations for solution mining of salt, for NGL/LPG storage, and for natural gas storage "as they do in Texas," Ratigan said. "There is an uniqueness to each industry that needs to be addressed."

A KDHE spokesman told OGJ Online that agency is already looking at strengthening its regulations and is considering possible action against Kansas Gas Service. He said some civil suits have already been filed against the company as a result of the mishap.



**SPECIAL PROJECT RULES AND OPERATING PROCEDURES
FOR THE
GRAMA RIDGE MORROW GAS STORAGE UNIT PROJECT AREA**

RULE 1. Each newly drilled or recompleted well penetrating the Morrow formation in the area of the Grama Ridge Morrow Gas Storage Unit Project Area shall be drilled, operated and produced in accordance with the Special Project Rules and Operating Procedures hereinafter set forth.

RULE 2. Provisions of these Special Project Rules and Operating Procedures shall apply to the Grama Ridge Morrow Gas Storage Unit Project Area (the "Unit Project Area" or "Unit Area") defined as and consisting of the following described acreage in Lea County, New Mexico:

GRAMA RIDGE MORROW
GAS STORAGE UNIT
PROJECT AREA

Township 21 South, Range 34 East

Section 33

Section 34

Township 22 South, Range 34 East

Section 3

Section 4

Section 10

RULE 3. For purposes of these Special Project Rules and Operating Procedures, the "Unitized Formation", as to State lands is defined by that April 25, 1973 Unit Agreement For The Operation Of The Grama Ridge Morrow Unit Area, Lea County, New Mexico, as amended, consists of "[t]hat subsurface portion of the unit area commonly known as the Morrow sands which is the same zone as the top and bottom of which were encountered at log depths of 12,722 feet and 13,208 feet in the Shell Oil Company State GRA Well No. 1 as shown on the Schlumberger Sonic Log B Gamma Ray Log of said well dated July 5, 1965, which said well is located 1980 feet from the North line and 660 feet from the west line of Section 3, Township 22 South, Range 34 East". As to State and fee lands, the Unit Area includes Section 33 and 34, Township 21 South, Range 34 East, and the NE/4 of Section 4 and all of Section 3, Township 22 South Range 34 East. As to Federal lands, the "Unitized Formation" consists of the Morrow Formation underlying the "gas storage reservoir area" (also the Unit Area) in Section 4 (excluding the surface of the NE/4 of said Section 4) and Section 10, Township 22 South, Range 34 East, as defined in that November 24, 1975 Agreement for the Subsurface Storage of Gas, No. 14-08-0001-14277, as amended.

RULE 4. For purposes of these Special Project Rules and Operating Procedures, the "Morrow Formation" is defined as the full extent of the vertical limits of the Morrow formation as defined by Order No. R-3006. The "Unit Operator" is defined as the operator of the Grama Ridge Morrow Gas Storage Unit Area.

RULE 5. Operators other than the Unit Operator proposing to drill a new well or recompleting an existing well penetrating or that may penetrate, the Morrow Formation within the Unit Project Area of the Grama Ridge Morrow Gas Storage Unit, as defined above, shall:

- a.) Provide the Unit Operator with advance written notification of intent to drill at the sooner of the date of filing of APD, C-101 and C-102 forms or thirty (30) days prior to commencing drilling operations.
- b.) On commencement of drilling operations, the operator shall provide the Unit Operator with the following information within twenty-four (24) hours of its availability:
 - (i) Daily drilling reports, including detailed time breakdown and other parameters normally associated with IADC daily drilling reports.
 - (ii) The anticipated date and time when the top of the Morrow formation will be encountered by the drill bit.
- c.) Provide Unit Operator with copies of all logs run on the well within twenty-four (24) hours of their availability and before casing is set.

RULE 6. For each well penetrating the Morrow Formation within the boundaries of the Unit Project Area and completed above the top of Unitized Formation, the operator shall:

- a.) Comply with the requirements of Rule 5 (a) through (c), above;
- b.) In the event of a cased hole into or through the Unitized Formation, operator will isolate the Unitized Formation by squeezing cement immediately above and below (if penetrated) the Unitized Formation and immediately below the operator's deepest completion interval. Run a cement bond log and then fill the casing with cement to a level higher than the top of the Unitized Formation.
- c.) In the case of an open hole into or through the Unitized Formation with casing set above the Unitized Formation;
 - (i) If the hole Total Depth is within the Unitized Formation, fill the hole with cement to a level 15' higher than the top of the Unitized Formation.
 - (ii) If the hole Total Depth is below the bottom of the Unitized Formation, set a bridge plug at a depth 15' below the bottom of the Unitized Formation and fill the hole with cement from the bridge plug to a level 15' higher than the top of the Unitized Formation.

RULE 7. For each well penetrating the Morrow Formation and completed below the base of Unitized Formation within the boundaries of the Unit Project Area, the operator shall:

- a.) Comply with the requirements of Rule 5 (a) through (c), above;
- b.) Squeeze cement immediately above the perforation interval, squeeze cement immediately below the Unitized Formation and squeeze cement immediately above the Unitized Formation.
- c.) Provide the Unit Operator with a cement bond log to document bond on all squeeze jobs; and
- d.) The operator shall take such other reasonable measures to assure that the Unitized Formation is isolated.

RULE 8. For each exploratory well penetrating the Morrow Formation that is to be plugged and abandoned without casing;

- a.) Comply with the requirements of Rule 5 (a) through (c), above;
- b.) Fill the hole with cement from a bridge plug set at 15' below the base of the Unitized Formation (if applicable) to a level 15' above the top of the Unitized Formation.

RULE 9. No completions within the Unitized Formation underlying the Unit Project Area by other than the Unit Operator shall be permitted.

RULE 10. These Special Project Rules and Operating Procedures shall not apply to any well that does not penetrate the Morrow Formation within the Grama Ridge Morrow Gas Storage Unit Project Area.

STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION


IN THE MATTER OF THE APPLICATION
OF RAPTOR NATURAL PIPELINE LLC FOR
SPECIAL PROJECT RULES FOR THE
GRAMA RIDGE MORROW GAS STORAGE UNIT,
LEA COUNTY, NEW MEXICO

CASE NO. 12,588

AFFIDAVIT

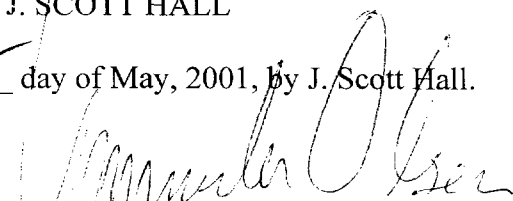
STATE OF NEW MEXICO)
) ss
COUNTY OF SANTA FE)

J. SCOTT HALL, attorney for Raptor Natural Pipeline LLC, the Applicant herein, being first duly sworn, upon oath, states that to the best of his knowledge the notice provisions of Rule 1207 of the New Mexico Oil Conservation Division have been complied with, that Applicant has caused to be conducted a good faith, diligent effort to find the correct address of all interested persons entitled to received notice, as shown by Exhibit "A," attached hereto, and that pursuant to Rule 1207, notice has been given by certified mail at the correct address provided by such rule.



J. SCOTT HALL

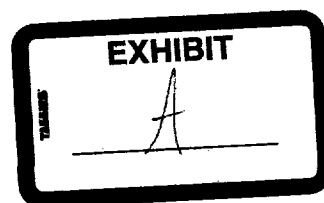
SUBSCRIBED AND SWORN to before me this 15 day of May, 2001, by J. Scott Hall.



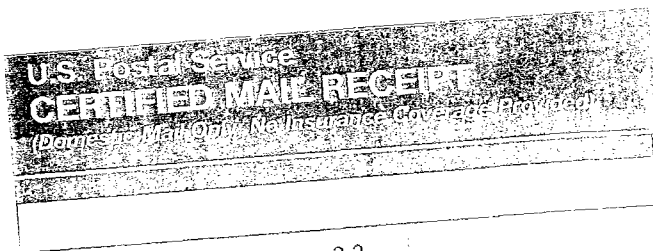
Notary Public

My Commission Expires:
2-12-2005

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Pecos River Operating, Inc.	Post Office Box 1675	Roswell, New Mexico 88202	Sir or Madam
Chevron USA, Inc.	Claydesta Plaza 15 Smith Road	Midland, Texas 79705	Sir or Madam
Nearburg Producing Company	3300 No. A Street Building 2, Suite 120	Midland, Texas 79705	Sir or Madam
Burgundy Oil & Gas of New Mexico, Inc.	401 W. Texas, Suite 1003	Midland, Texas 79701	Sir or Madam
C. W. Trainer c/o Oil Reports & Gas Services, Inc.	1008 West Broadway	Hobbs, New Mexico 88240	Sir or Madam
Chaparral Energy, Inc.	701 Cedar Lake Blvd.	Oklahoma City, Oklahoma 73114	Sir or Madam
Exxon-Mobil Corporation	Post Office Box 4358	Houston, Texas 77210-4358	Sir or Madam
Roca Resource Company, Inc.	Post Office Box 1981	Midland, Texas 79702-1981	Sir or Madam
BTA Oil Producers	104 South Pecos	Midland, Texas 79701	Sir or Madam
EOG Resources, Inc.	Post Office Box 2267	Midland, Texas 79702	Sir or Madam
Apache Corporation	2000 Post Oak #100	Houston, Texas 77056-4400	Sir or Madam
Hadson Energy Resources	101 Park Ave, Suite 1300	Oklahoma City, Oklahoma 73102	Sir or Madam
Commissioner of Public Lands	Post Office Box 1148	Santa Fe, New Mexico 87504-1148	Sir or Madam
State of New Mexico Bureau of Land Management	620 W. Greene Street	Carlsbad, New Mexico 88220-4811	Sir or Madam



Great Western Drilling Company	700 W. Louisiana, Box 1659	Midland, Texas 79702	Sir or Madam
Yates Petroleum Corporation	105 South Fourth Street	Artesia, New Mexico 88210-2177	Sir or Madam
Mitchell Energy Corporation	Post Office Box 4000	The Woodlands, TX 77387-4000	Sir or Madam



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OF COUNSEL

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PLEASE REPLY TO SANTA FE

* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Apache Corporation
2000 Post Oak #100
Houston, Texas 77056-4400

Re: NMOCDC Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

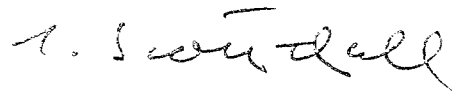
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January 2, 2001

Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in cursive script, appearing to read "J. Scott Hall".

J. Scott Hall

Enclosure(s) – as stated

JSH/ao

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BTA Oil Producers

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City, State, ZIP+4

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		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

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OF COUNSEL

WILLIAM K. STRATVERT
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* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

BTA Oil Producers
104 South Pecos
Midland, Texas 79701

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico

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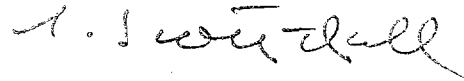
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January 2, 2001
Page two

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MILLER, STRATVERT & TORGERSON, P.A.

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J. Scott Hall

Enclosure(s) -- as stated

JSH/ao

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 Street, Apt. No., or P.O. Box No.
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 City, State, ZIP

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<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
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** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Bureau of Land Management
620 W. Greene Street
Carlsbad, New Mexico 88220-4811

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico

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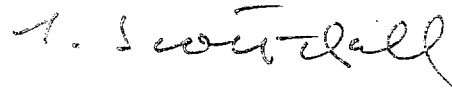
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J. Scott Hall

Enclosure(s) -- as stated

JSH/ao

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Burgundy Oil & Gas Of NM, Inc.
 Street, Apt. No. or PO Box No.
401 W. TX, Suite 1003
 City, State, ZIP+4
Midland, TX 79701

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1. Article Addressed to: Burgundy Oil & Gas of NM 401 W. Texas Suite 1003 Midland, TX 79701		C. Signature X - Reese Brown	
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		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
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Burgundy Oil & Gas of New Mexico, Inc.
401 W. Texas, Suite 1003
Midland, Texas 79701

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
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D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No									
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701 Cedar Lake Blvd.
Oklahoma City, Oklahoma 73114

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Recipient's Name (Please Print Clearly; to be completed by mailer) Chevron USA, Inc. Claydesta Plaza Street, Apt. No., or P.O. Box No. 15 Smith Road, Midland, TX 79705 City, State, ZIP+4	

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<p>2. Article Number (Copy from service label)</p> <p>7000 0600 0025 0308 8717</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

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OF COUNSEL

WILLIAM K. STRATVERT
RALPH WM. RICHARDS

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* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Chevron USA, Inc.
Claydesta Plaza
15 Smith Road
Midland, Texas 79705

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas
Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

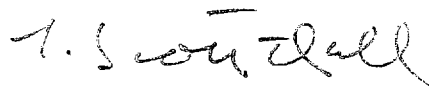
Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

This matter is scheduled for hearing before one of the Division's Examiners at 8:15 a.m. on Thursday, January 25, 2001 at the Division's offices located at 1220 South St. Francis Street, Santa Fe, New Mexico 87505. You are not required to attend, but you do have the right to appear at the hearing and present testimony. Failure to appear at the hearing and become a party of record will preclude you from contesting this matter at a later date.

January 2, 2001
Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in dark ink, appearing to read "J. Scott Hall". The signature is written in a cursive style with a horizontal line above the "J" and a long, sweeping underline.

J. Scott Hall

Enclosure(s) – as stated

JSH/ao

7849/26119/Correspondence/Notice ltr.doc

7000 0600 0025 0308 8601

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CERTIFIED MAIL RECEIPT	
(Domestic Mail Only. No Insurance Coverage Provided)	
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Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$.33
Recipient's Name (Please Print Clearly, (to be completed by mailer)) Commissioner of Public Lands Street, Apt. No., or PO Box No. P.O. Box 1148, Santa Fe 87504 City, State, ZIP+4	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<input type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.	A. Received by (Please Print Clearly) B. Date of Delivery C. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:
1. Article Addressed to: Commissioner of Public Lands PO Box 1148 Santa Fe, NM 87504-1148	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes
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** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Commissioner of Public Lands
State of New Mexico
Post Office Box 1148
Santa Fe, New Mexico 87504-1148

Re: NMOCDC Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

This matter is scheduled for hearing before one of the Division's Examiners at 8:15 a.m. on Thursday, January 25, 2001 at the Division's offices located at 1220 South St. Francis Street, Santa Fe, New Mexico 87505. You are not required to attend, but you do have the right to appear at the hearing and present testimony. Failure to appear at the hearing and become a party of record will preclude you from contesting this matter at a later date.

January 2, 2001
Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in cursive script, appearing to read "J. Scott Hall".

J. Scott Hall

Enclosure(s) -- as stated

JSH/ao

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Concho Resources, Inc.
110 W. Louisiana Ave
Midland, TX 79701

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** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 23, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Concho Resources, Inc.
110 W. Louisiana Ave
Midland, Texas 79701

Re: NMOCD Case No. 12588; Application of Raptor Natural Pipeline LLC, f/k/a
LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge
Morrow Gas Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

This matter is scheduled for hearing before one of the Division's Examiners at 8:15 a.m. on Thursday, February 22, 2001 at the Division's offices located at 1220 South St. Francis Street, Santa Fe, New Mexico 87505. You are not required to attend, but you do have the right to appear at the hearing and present testimony. Failure to appear at the hearing and become a party of record will preclude you from contesting this matter at a later date.

January 23, 2001
Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in dark ink, appearing to read "J. Scott Hall", written in a cursive style.

J. Scott Hall

Enclosure(s) – as stated

JSH/ao

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C.W. Trainer (Oil Reports & Gas)
 Street, Apt. No., or PO Box No.
1008 West Broadway, Hobbs, NM 88240
 City, State, ZIP+4

7000 0600 0025 0308 8687

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1. Article Addressed to: C. W. Trainer c/o Oil Reports & Gas Svcs. 1008 West Broadway Hobbs, NM 88240	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
2. Article Number (Copy from service label) 7000 0600 0025 0308 8687	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

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** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

C. W. Trainer
c/o Oil Reports & Gas Services, Inc.
1008 West Broadway
Hobbs, New Mexico 88240

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

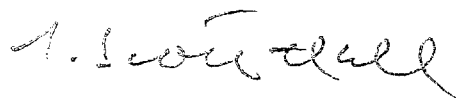
Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

This matter is scheduled for hearing before one of the Division's Examiners at 8:15 a.m. on Thursday, January 25, 2001 at the Division's offices located at 1220 South St. Francis Street, Santa Fe, New Mexico 87505. You are not required to attend, but you do have the right to appear at the hearing and present testimony. Failure to appear at the hearing and become a party of record will preclude you from contesting this matter at a later date.

January 2, 2001
Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in cursive script, appearing to read "J. Scott Hall".

J. Scott Hall

Enclosure(s) -- as stated

JSH/ao

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EOG Resources Inc.	
Street, Apt. No., or PO Box No.	
PO Box 2267 Midland, TX 79702	
City, State, ZIP	

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C. Signature											
<input checked="" type="checkbox"/> Agent	<input type="checkbox"/> Addressee										
D. Is delivery address different from item 1? <input type="checkbox"/> Yes											
If YES, enter delivery address below: <input type="checkbox"/> No											
1. Article Addressed to: EOG Resources, Inc. PO Box 2267 Midland, TX 79702	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.										
2. Article Number (Copy from service label)	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes										

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JENNIFER L. OLSON

COUNSEL

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ROSS B. PERKAL
JAMES J. WIDLAND
BRADLEY D. TEPPER **
GARY RISLEY

OF COUNSEL

WILLIAM K. STRATVERT
RALPH WM. RICHARDS

ALBUQUERQUE, NM

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* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

EOG Resources, Inc.
Post Office Box 2267
Midland, Texas 79702

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas
Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

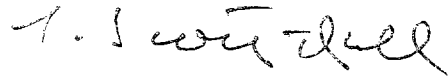
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January 2, 2001

Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in cursive script, appearing to read "J. Scott Hall".

J. Scott Hall

Enclosure(s) – as stated

JSH/ao

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** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Exxon-Mobil Corporation
Post Office Box 4358
Houston, Texas 77210-4358

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas
Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

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January 2, 2001

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J. Scott Hall

Enclosure(s) -- as stated

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Midland, TX 79702

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2. Article Number (Copy from service label) 7000 0600 0025 0308 8588		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
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* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001

CERTIFIED/RETURN RECEIPT REQUESTED

Great Western Drilling Company
State of New Mexico
700 W. Louisiana, Box 1659
Midland, Texas 79702

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas
Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

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January 2, 2001
Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

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J. Scott Hall

Enclosure(s) – as stated

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OK City, OK 73102

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Hadson Energy Resources
101 Park Ave, Suite 1300
Oklahoma City, Oklahoma 73102

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** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Hadson Energy Resources
101 Park Ave, Suite 1300
Oklahoma City, Oklahoma 73102

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas
Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

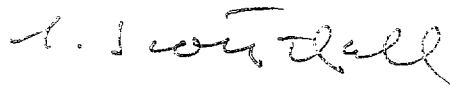
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J. Scott Hall

Enclosure(s) – as stated

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January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Mitchell Energy Corporation
Post Office Box 4000
The Woodlands, TX 77387-4000

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OF COUNSEL

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* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001

CERTIFIED/RETURN RECEIPT REQUESTED

Nearburg Producing Company
3300 No. A Street
Building 2, Suite 120
Midland, Texas 79705

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

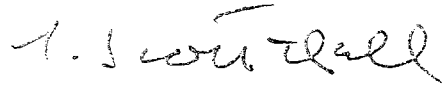
Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

This matter is scheduled for hearing before one of the Division's Examiners at 8:15 a.m. on Thursday, January 25, 2001 at the Division's offices located at 1220 South St. Francis Street, Santa Fe, New Mexico 87505. You are not required to attend, but you do have the right to appear at the hearing and present testimony. Failure to appear at the hearing and become a party of record will preclude you from contesting this matter at a later date.

January 2, 2001
Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in cursive script, appearing to read "J. Scott Hall".

J. Scott Hall

Enclosure(s) – as stated

JSH/ao

7849/26119/Correspondence/Notice ltr.doc

7000 0600 0025 0308 8724

U.S. Postal Service
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 (Domestic Mail Only. No Insurance Coverage Provided)

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Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	0.33	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
Pecos River Operating, Inc.
 Street, Apt. No., or P.O. Box No.
PO Box 1675, Roswell, NM 88202
 City, State, ZIP+4

SENDER COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<input checked="" type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.	A. Received by (Please Print Clearly) _____ B. Date of Delivery <u>9-26</u> C. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
1. Article Addressed to: Pecos River Operating, Inc. PO Box 1675 Roswell, NM 88202	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
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* NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN NATURAL RESOURCES - OIL & GAS LAW
** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Pecos River Operating, Inc.
Post Office Box 1675
Roswell, New Mexico 88202

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas
Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

This matter is scheduled for hearing before one of the Division's Examiners at 8:15 a.m. on Thursday, January 25, 2001 at the Division's offices located at 1220 South St. Francis Street, Santa Fe, New Mexico 87505. You are not required to attend, but you do have the right to appear at the hearing and present testimony. Failure to appear at the hearing and become a party of record will preclude you from contesting this matter at a later date.

January 2, 2001

Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in black ink, appearing to read "J. Scott Hall". The signature is written in a cursive, flowing style.

J. Scott Hall

Enclosure(s) -- as stated

JSH/ao

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UNITED STATES POSTAL SERVICE
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Recipient's name (Please Print Clearly) (to be completed by addressee)
Roca Resource Company, Inc.
 PO Box 1981, Midland, TX 79702
 City, State, ZIP+4

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p><input checked="" type="checkbox"/> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p><input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you.</p> <p><input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to: Roca Resource Company, Inc. PO Box 1981 Midland, TX 79702</p>	<p>A. Received by (Please Print Clearly) JAN 4 2001</p> <p>B. Date of Delivery</p> <p>C. Signature X Mary Rebus <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>
<p>2. Article Number (Copy from service label) 7000 0600 0025 0308 8656</p>	<p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

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OF COUNSEL

WILLIAM K. STRATVERT
RALPH WM. RICHARDS

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** NEW MEXICO BOARD OF SPECIALIZATION RECOGNIZED SPECIALIST IN REAL ESTATE LAW

January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Roca Resource Company, Inc.
Post Office Box 1981
Midland, Texas 79702-1981

Re: NMOCDC Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

Please be advised that Raptor Natural Pipeline LLC, f/k/a LG&E Natural Pipeline LLC, has filed an Amended Application with the New Mexico Oil Conservation Division seeking an order providing for special operating rules in the vicinity of the Grama Ridge Morrow Gas Storage Unit. A copy of the Amended Application is enclosed. The area affected is described in the Amended Application.

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January 2, 2001
Page two

Very truly yours,

MILLER, STRATVERT & TORGERSON, P.A.

A handwritten signature in cursive script, appearing to read "J. Scott Hall".

J. Scott Hall

Enclosure(s) – as stated

JSH/ao

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Recipient's Name (Please Print Clearly) (to be completed by mailer)
Yates Petroleum Corp.
 Street, Apt. No., or PO Box No.
105 S. Fourth Street
 City, State, ZIP
Artesia, NM 88210

SENDER COMPLETE THIS SECTION

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- ☐ Print your name and address on the reverse so that we can return the card to you.
- ☐ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Yates Petroleum Corp.
105 S. 4th Street
Artesia, NM 88210-2177

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **LAURET PLYNCK** B. Date of Delivery **1-4-01**

C. Signature **Lauret Plynck** ☐ Agent ☐ Addressee

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If YES, enter delivery address below:

3. Service Type

☐ Certified Mail ☐ Express Mail

☐ Registered ☐ Return Receipt for Merchandise

☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Copy from service label) **7000 0600 0025 0308 8571**

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January 2, 2001
CERTIFIED/RETURN RECEIPT REQUESTED

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210-2177

Re: NMOCD Case No. 12441; Application of Raptor Natural Pipeline LLC, f/k/a LG&E
Natural Pipeline LLC, For Special Project Rules For The Grama Ridge Morrow Gas
Storage Unit, Lea County, New Mexico

Dear Sir or Madam:

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J. Scott Hall

Enclosure(s) – as stated

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