Gruy Petroleum Management Co.

5215 North O'Connor Blvd. ♦ Suite 1500 ♦ Irving, TX 75039 ♦ (972) 401-3111 ♦ Fax (972) 443-6486 Mailing Address: P.O. Box 140907 ♦ Irving, TX 75014-0907

A subsidiary of Cimarex Energy Co. • A NYSE Listed Company • "XEC"



RECEIVED

FEB 1 0 2006

UUU-MITTESIA

February 1, 2006

Oil Conservation Division District II Office 1301 W. Grand Ave. Artesia, New Mexico 88210 Attn: Mr. Bryan Arrant

Re: Statewide Rule 118

Hydrogen Sulfide Gas Contingency Plan Proposed Grayburg Deep Unit No. 19 Well

Dear Mr. Arrant:

In accordance with NMAC 19.15.3.118 C. (1) governing the determination of the hydrogen sulfide concentration in gaseous mixtures in each of its operations, Gruy Petroleum Management Co. does not anticipate that there will be enough H2S from the surface to the Morrow/Atoka formations to meet the OCD's minimum requirements for the submission of a contingency plan for the drilling and completion of the following test(s):

30 - c/5- 34776

Grayburg Deep Unit No. 19 21

Sec 25-T17S-R29E

1535' FNL & 1180' FEL

Eddy Co., NM

If anything further is needed regarding this issue, or if you have any questions, please feel free to contact the undersigned at 972-443-6489.

Yours truly,

Zeno Farris

Manager, Operations Administration

Zeno Famis