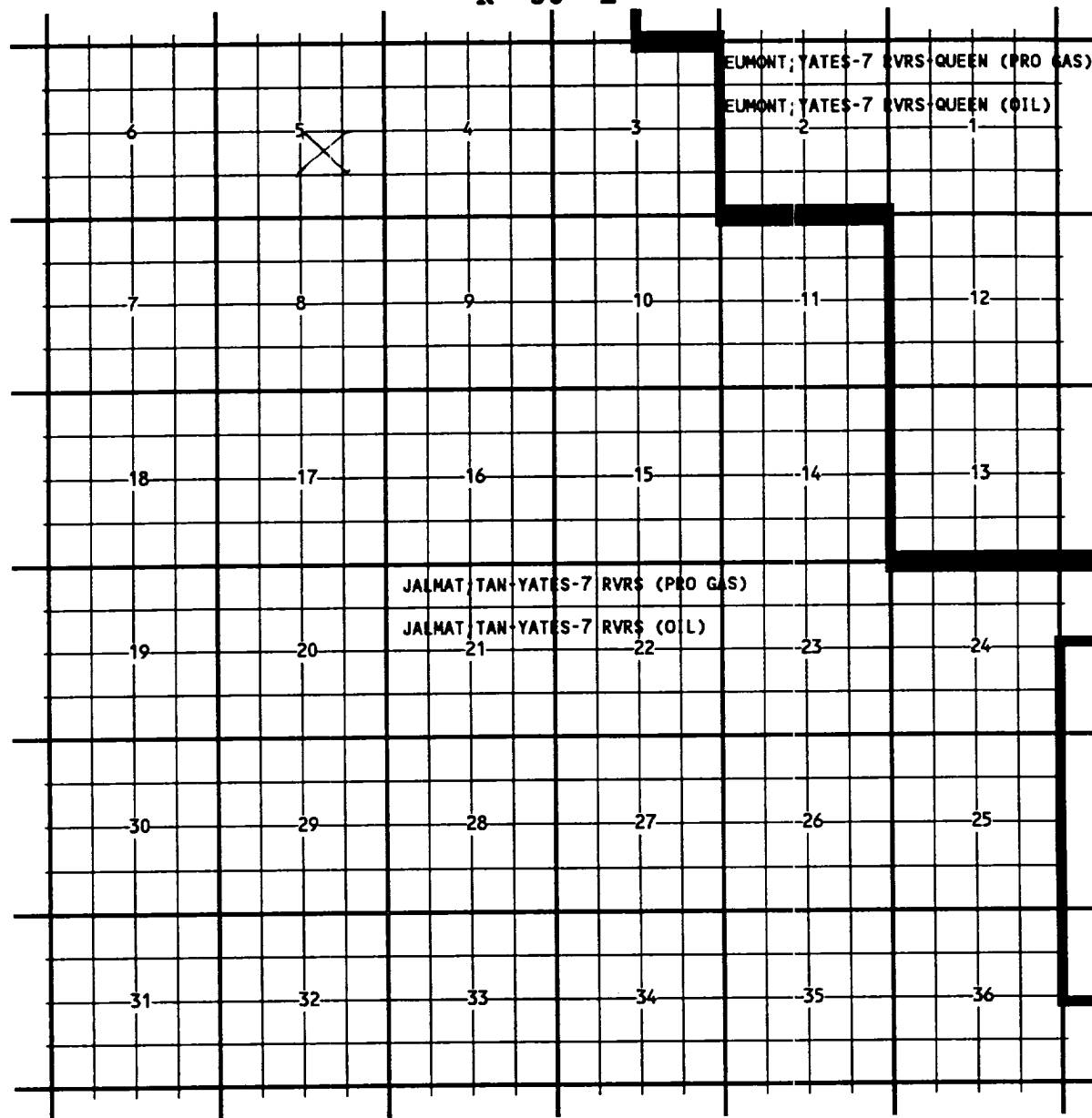


FORMATION: UPPER 7 RVS

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R 36 E

JALMAT; TAN-YATES-7 RVRS (PRO GAS)

RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

October 18, 1999

Mr. Michael Stogner
New Mexico Oil Conservation Division
2040 Pacheco
Santa Fe, New Mexico 87504

RE: Application for Unorthodox Gas Well Locations and Simultaneous Dedication
Jalmat, Tansil Yts 7 Rvrs (Pro Gas)
1980' FSL and 1980' FEL
Section 5, T 22S, R 36E (J)
Lea County, New Mexico

Dear Mr. Stogner,

Raptor Resources, Inc. respectfully requests your approval of this administrative application for the subject Unorthodox Gas Well Location and Simultaneous Dedication.

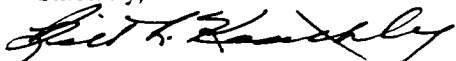
Raptor Resources, Inc. is planning to re-complete it's State "A" A/C 2 Well No. 34 in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool. We request a decrease in the size of the existing 400-acre GPU by 80 acres to exclude the SE/4 NW/4 Unit F and the SW/4 SE/4 Unit O of Section 5. It is our desire to also simultaneously dedicate the existing 280-acre Proration Unit assigned to our well no .27 to both wells. Previously approved orders are R 9073, NSP 518. Well nos. 33 and 44 are being assigned the 40 acre proration Units (SE/4 NW/4 Unit F and SW/4 SE/4 Unit O) of section 5. Due to being reclassified from gas to oil in the Jalmat Tansil Yates 7-Rivers Oil pool per the NMOCD in Hobbs. Well no 27 located in the SE/4 SE/4 Unit P, is being reclassified from oil to gas.

The offset operator plat shows that Chevron USA, CITGO, Southwest Royalties and Lion Production Inc. 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@juno.com.

Sincerely,



Bill R. Keathly
Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

State "A" A/C 2 # 34
Section 5, T-22S, R-36E, (J)
API # 30-025-08794
Lea County, New Mexico

RE: Application for Unorthodox Location

Notification of Offset Operators:

Chevron U S A Inc
Attn: WOJV-Business Unit
P.O. Box 1635
Houston, TX 77251

CITGO
P.O. Box 3758
Tulsa, Okla. 74102

Lion Production Inc
P.O. Box 2086
Midland, TX 79702

Southwest Royalties Inc
P.O. Box 11390
Midland, TX 79702

Please find attached evidence that the above listed companies have been sent copies of the Non-standard location request.

Z 444 966 625

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	CITGO
Street & Number	Box 3158
Post Office, State, & ZIP Code	Tulsa OK 74102
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.20
Postmark or Date	APR 21 1995

PS Form 3800, April 1995 State A X/C2 #34

Z 444 966 626

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Lion Production Inc.
Street & Number	Box 2036
Post Office, State, & ZIP Code	Midland, TX 79702
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.20
Postmark or Date	APR 21 1995

PS Form 3800, April 1995 State A X/C2 #34

Z 444 966 624

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Chevron USA Inc.
Street & Number	Box 1635
Post Office, State, & ZIP Code	Houston TX 77251
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.20
Postmark or Date	APR 21 1995

PS Form 3800, April 1995 State A X/C2 #34

Z 444 966 627

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Southwest Royalties
Street & Number	Box 11590
Post Office, State, & ZIP Code	Midland, TX 79702
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 3.20
Postmark or Date	APR 21 1995

PS Form 3800, April 1995 State A X/C2 #34

Southwest Royalties
Lion Production Inc

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