

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

August 24, 1999

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

E: Administrative application for two additional Jalmat gas wells (State "A" A/C-2 Wells No. 19 and 21) within an existing non-standard gas spacing and proration unit ("GPU") in Section 7, Township 22 South, Range 36 East, NMPM, Jalmat Gas Pool, Lea County, New Mexico.

Dear Mr. Keathly:

In your applications for the two aforementioned wells you reference an existing 480-acre unit (comprising the NE/4 and S/2 of Section 7) assigned to Raptor Resources, Inc.'s State "A" A/C-2 Wells No. 5 and 8. My records indicate that Division Order No. R-9073 authorized a 393.06-acre GPU comprising Lots 3 and 4 (W/2 SW/4 equivalent), N/2 NE/4, SE/4 NE/4, E/2 SW/4, N/2 SE/4, and SE/4 SE/4 of Section 7 (see Paragraph No. 2 of Exhibit "A" to R-9073).

Your applications appear to be incomplete since no mention or provision was made to increase the size of the existing 393.06-acre GPU by 40 acres to include the SW/4 SE/4 Unit O) of Section 7 and, of course, to omit any mention of the 40-acre Jalmat oil spacing and proration unit (SW/4 NE/4 of Section 7) currently dedicated to the State "A" A/C-2 Well No. 9. Therefore, I am returning both applications to you at this time for modification.

Sincerely

Michael E. Stogner Chief Hearing Officer/Engineer

MES/kv

cc: New Mexico Oil Conservation Division - Hobbs New Mexico State Land Office – Santa Fe Kathy Valdes - OCD, Santa Fe

RE: