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December 5, 2001

HAND-DELIVERED

Lori Wrotenbery, Director
Oil Conservation Division
New Mexico Energy, Minerals and
Natural Resources Department
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

Re: **Application of Raptor Resources, Inc for Administrative Approval of an unorthodox gas well location for its State "A" A/C-2 Well No. 54(API No. 30-025-08841) at a point 660 feet from the South line and 1980 feet from the East line of Section 8, Township 22 South, Range 36 East, NMPM, and simultaneous dedication of this well and other existing wells to a standard spacing unit in the Jalmat gas Gas Pool, Lea County, New Mexico.**

Dear Ms. Wrotenbery:

Pursuant to the provisions of the Special Rules and Regulations for the Jalmat Gas Pool as promulgated by Division Order No. R-8170, as amended, and the Amended Stipulated Declaratory Judgment issued by the First Judicial District Court of Santa Fe County, New Mexico on July 11, 2001, in Hartman v. Oil Conservation Commission (Cause No. D-0101-CV-9902927), Raptor Resources, Inc. hereby files its application for approval of an unorthodox gas well location for its State "A" A/C-2 Well No. 54 (**API No. 30-025-088410**) at location 660 feet from the South line and 1980 feet from the East line (Unit O) of Section 8, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico and the simultaneous of this well and all existing producing Jalmat gas wells on a standard 640-acre spacing unit comprised of said Section 8. The approval of this application and the re-completion of this well in the Jalmat Gas Pool will result