

RAPTOR RESOURCES, INC.

P.O. Box 160430

Austin, Texas 78716-0430

(512) 478-4427

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)
660' FSL and 660' FWL
Section 9, T-22S, R-36E
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. 4 in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool. It is our desire to also simultaneously dedicate the existing 480 acre Proration Unit assigned to our well nos.40, 63, 29, 57, 67, 38, 72, and 1 to all nine wells. As a result, the location of Well No 1 becomes unorthodox in that it is less than 990 feet from the outer boundary of the proration unit. The location of Well No 1 is 660' FSL and 1980' FWL of Section 9, T-22-S, R-36E, Lea County, New Mexico.

The offset operator plat shows that Arco Permian, OXY U.S.A. Inc, Chevron, Inc, Marathon Oil Co. and Wiser Oil Co. are the offset operators that could be affected by this unorthodox location. Please find enclosed evidence that they have been notified of this application.

Raptor Resources, Inc. respectfully requests that and unorthodox location and simultaneous dedication order be issued based on the reasons given in the preceding paragraphs. If there are any further questions concerning this application please call me at (915) 697-1609.

Sincerely,



Bill R. Keathly
Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs