

DOYLE HARTMAN

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October 30, 1999

VIA FACSIMILE: 512/478-4476

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Raptor Resources, Inc.
901 Rio Grande (78701)
P.O. Box 160430
Austin, TX 78716-0430
Attn: Russell Douglass, President
Mike Nell, Vice President

VIA FACSIMILE : 915/684-4508

Raptor Resources, Inc.
414 W. Texas, Suite 202
Midland, TX 79701
Attn: Bill R. Keathly, Regulatory Agent

Re: Raptor's Dense-Spacing Infill Program
Jalmat Gas Pool
T-22-S & T-23-S, R-36-E
Lea County, New Mexico

Gentlemen:

Reference is made to our letter of October 29, 1999, to Ms. Lori Wrotenbery and Mr. Michael Stonger of the New Mexico Oil Conservation Division, including our discussion corresponding to Raptor's proposed State "A" A/C-2 Nos. 54 and 77 completions located in the S/2 SE/4 Section 8, T-22-S, R-36-E.

After becoming aware of Raptor's C-103 for its proposed State "A" A/C-2 No. 54 recompletion, I have now had an opportunity to compare well logs with the C-101's that Raptor has filed for its State "A" A/C-2 Nos. 30 and 48 wells located in the NW/4 Section 9, T-22-S, R-36-E. It appears that Raptor has proposed the following completion intervals and pool designations for its Nos. 30, 48, and 54 wells.

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October 29, 1999

Lori Wrotenbery, Director
Michael Stogner, Chief Hearing Examiner
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Re: Failure by Raptor Resources, Inc. to Give Proper Notice
Raptor's Jalmat Infill Program
Sections 8 and 9, T-22-S, R-36-E, Lea County, New Mexico

Dear Ms. Wrotenbery and Mr. Stogner:

Doyle Hartman is an offset Jalmat operator to Raptor Resources, Inc. (Raptor), with respect to the above-referenced Sections 8 and 9, T-22-S, R-36-E, Lea County, New Mexico, by virtue of the 160-acre Jalmat State "H" lease in the NE/4 of Section 17, T-22-S, R-36-E. In 1998, Doyle Hartman and James A. Davidson acquired the State "H" Lease from OXY USA, Inc., effective November 1, 1997, and recorded the lease of record in Lea County, New Mexico, on April 24, 1998. A copy of a Lea County ownership map, which reflects Hartman's ownership in that lease, is attached as Exhibit "A".

Please accept this letter as a general objection, on behalf of Doyle Hartman and James A. Davidson, to the Jalmat infill drilling and recompletion program which Raptor Resources is presently undertaking in Sections 8 and 9, T-22-S, R-36-E (and also to Raptor's dense infill drilling throughout the Jalmat Pool). See Exhibit "A". Hartman has previously set out objections to unjustified high-density Jalmat infill drilling and recompletion programs to Raptor by letter dated October 21, 1999. Copy attached as Exhibit "B". A more detailed explanation of Hartman's objections to high-density Jalmat infill drilling and recompletion programs is set out in Hartman's letter to Ms. Wrotenbery, director of the NMOCDD, dated October 13, 1999, with respect to a package of administrative applications submitted by SDX Resources, Inc. (SDX). A copy of that letter is attached as Exhibit "C".