

RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

October 17, 2000

Lori Wrotenbery, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Re: *Application of Raptor Resources, Inc for Administrative Approval of a non-standard Gas Proration Unit, an unorthodox gas well location for its State "A" A/C-2 Well No. 32Y at a point 2050 feet from the South line and 760 feet from the West line of Section 9, Township 22 South, Range 36 East, NMPM, and simultaneous dedication of this well and other existing wells to the 480-acre standard GPU in the Jalmat Gas Pool, Lea County, New Mexico.*

Dear Ms. Wrotenbery:

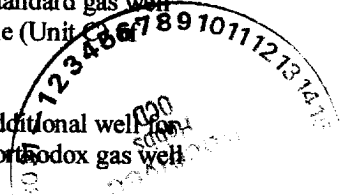
Raptor Resources, Inc hereby seeks administrative approval of a non-standard 480-acre Gas Spacing and Proration Unit ("GPU") in the Jalmat Gas Pool, an unorthodox gas well location for its State "A" A/C-2 Well No. 32Y to be re-entered and completed in the Jalmat Gas Pool at location 2050 feet from the South line and 760 feet from the West line (Unit L) of Section 9, Township 22 South, Range 36 East, NMPM, Lea County, New Mexico, and for simultaneous dedication of this GPU to all producing Jalmat Gas Wells located thereon.

The State "A" A/C-2 Well No 32Y was drilled at a standard oil well location to test the Langlie Mattix Pool (Seven Rivers-Queen-Grayburg). Raptor now seeks authority to re-enter and recomplete this well up-hole in the Jalmat Gas Pool (Tansill-Yates-Seven Rivers) and to simultaneously dedicate this well and the other Jalmat gas wells thereon to a 480-acre standard GPU comprising the N/2 and the SW/4 of Section 9, Township 22 South, Range 36 East, NMPN, Lea County, New Mexico.

A standard 480-acre GPU comprised of the N/2 and the SW/4 of Section 9, Township 22 South, Range 36 East, MNPN, was established by Division order R-9073, issued in Case No. 9775, dated December 14, 1989 and had dedicated thereto the State A/C-2 Well No. 38 (API No. 30-025-08847) located at an unorthodox gas well location 1980 feet from the South and 1980 from the West line (Unit K) of Section 9; and

- (1) State "A" A/C-2 Well No. 40 (API No. 30-025-08848) located at a standard gas well location 990 feet from the North line and 990 feet from the East line (Unit A) Section 9; and
- (2) State "A" A/C-2 Well No. 63 (API No. 30-025-25543) located at a standard gas well location 990 feet from the North line and 2310 feet from the West line (Unit C) Section 9

By Division Administrative Order NSL-2872, dated September 25, 1990, an additional well on this GPU the State "A" A/C-2 Well No. 57 (API No. 30-025-20297), Located at an unorthodox gas well location 1980 feet from the North and East lines (Unit G) of Section 9 was approved.



By Division Administrative Order NSL-2872-A, dated January 14, 1991, the following four wells all located at unorthodox gas well locations in Section 9 were also approved for the subject GPU:

- (1) State "A" A/C-2 Well No. 29, (API No. 30-025-08854)
660' from the North and West lines (Unit D);
- (2) State "A" A/C-2 Well No. 52, (API No. 30-025-08859)
1980' from the North line and 660' from the East line (Unit H);
- (3) State "A" A/C-2 Well No. 67, (API No. 30-025-28276)
2615' from the South line and 1345' from the West line (Unit K);
- (4) State "A" A/C-2 Well No 72, (API No. 30-025-28281)
1410' from the South line and 1440' from the West line (Unit K),

By Division Administrative Order NSL-2872-B, dated November 4, 1992, another well for this GPU, the State "A" A/C-2 Well No. 1 (API No. 30-025-08849), located at an unorthodox gas well location in Section 9 was also approved.

By Division Administrative Order NSL-2872-C (SD), dated July 6, 1999, an additional well for this GPU, the State "A" A/C-2 Well No. 4 (API No. 30-025-08853), located at an unorthodox gas well location 660 feet from the South and West lines (Unit M) of Section 9 was approved.

Raptor seeks authorization to add the NW/4 SW/4 of Section 9 to this GPU in the Jalmat Gas Pool and to simultaneously dedicate this non-standard GPU to the following gas well which will produce there from:

- (1) State "A" A/C-2 Well No. 32Y which is the subject of this application.

The Jalmat Gas Pool is governed by Special Pool Rules and Regulations, promulgated by Division order No. R-8170. Rule 2(b) of these rules provides for wells located on 480-acre spacing units to be located no closer than 990 feet from the outer boundary of GPU.

Attached hereto as Exhibits A is a plat which shows the subject 480-acre spacing unit comprised of N/2, & SW/4 of Section 9 and the operators of offsetting tracts which are not operated by Raptor. Exhibit B is a copy of the Oil Conservation Division Form C-102 which shows the location of the proposed unorthodox well location and all other wells currently dedicated to this non-standard spacing and proration unit.

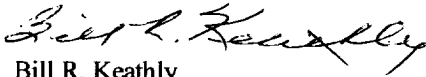


Raptor Resources, Inc
Application for Administrative Approval of
Unorthodox Well Locations and Simultaneous Dedication
October 17, 2000
Page 3

Exhibit C is a list of wells that shows the State "A" A/C-2 Wells No. 31, 32Y, and 52 have been plugged and abandoned. Exhibit D lists the parties affected by this application. A copy of this Application including a copy of the plat described above has been sent to these affected parties by certified mail-return receipt requested in accordance with Rule 1207 (A)(5) advising them that if they have an objection to this application it must be filed in writing with the Division's Santa Fe office within twenty days from the date this notice was sent.

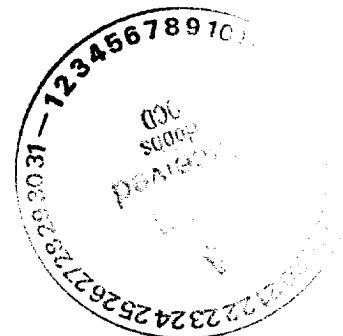
Your attention to this application is appreciated.

Very truly yours,



Bill R. Keathly
Regulatory Agent for Raptor Resources, Inc

cc: Oil Conservation Division-Hobbs



Garry Petro. m9m.t.

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District I
1625 N. French Dr., Hobbs. NM 88240

District II
PO Drawer DD, Artesia, NM 88211-0719

District III
1000 Rio Brazos Rd. Aztec, NM 87410

District IV
PO Box 2088, Santa Fe. NM 87504-2088

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

Form C-102

Revised February 21, 1994

Instructions on back

Submit to Appropriate District Office

State Lease - 4 Copies

Fee Lease - 3 Copies

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-08557	2 Pool Code 79240	3 Pool Name Jalmat Tansill Yates 7 Rvrs (Pro Gas)
4 Property Code 24671	5 Property Name State A A/C 2	6 Well Number 32 Y
7 OGRID No. 162791	8 Operator Name Raptor Resources	9 Elevation

10 Surface Location

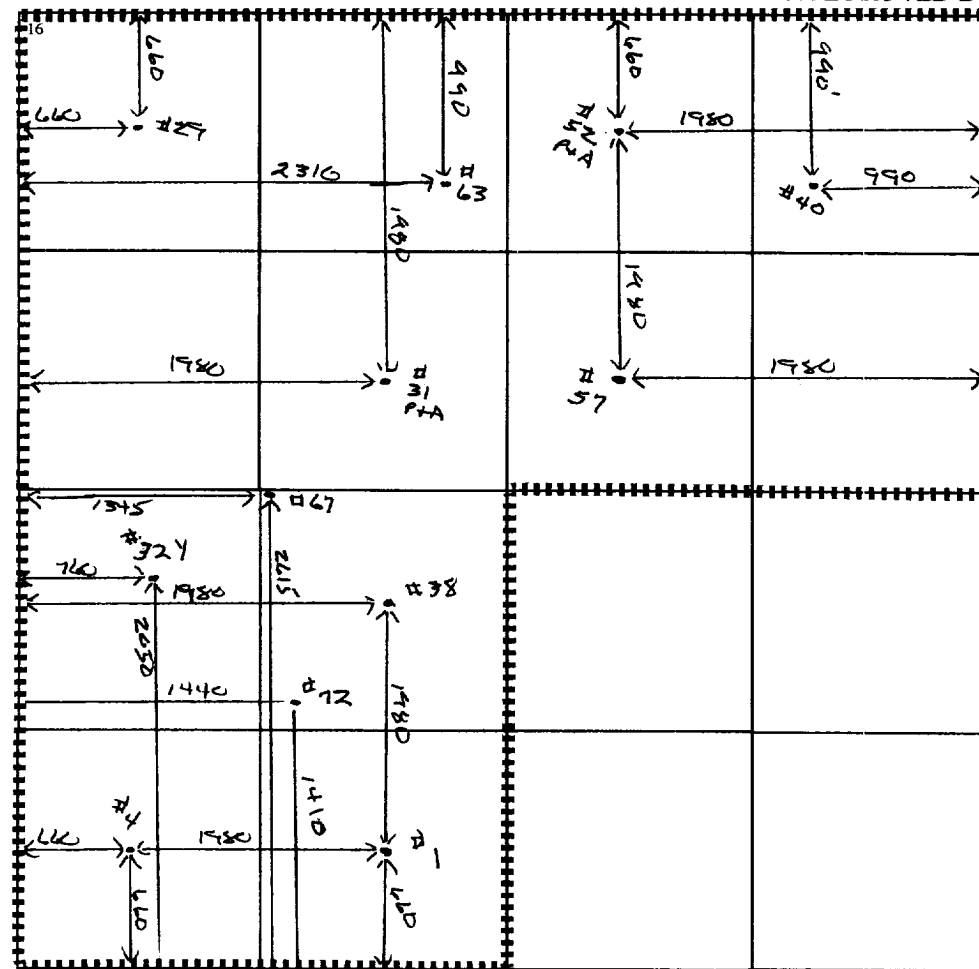
UL or lot no. L	Section 9	Township 22S	Range 36E	Lot Idn	Feet from the 2050	North/South line South	Feet from the 760	East/West line West	County Lea
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11 Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
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12 Dedicated Acres 480	13 Joint or Infill	14 Consolidation Code	15 Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED
OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



17 OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief

Bill R. Keathly
Signature

Bill R. Keathly
Printed Name

Regulatory Agent
Title

10-18-00
Date

18 SURVEYOR CERTIFICATION

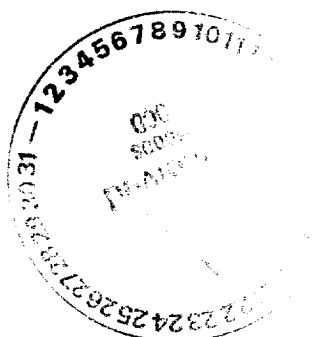
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief

Date of Survey

Signature and Seal of Professional Surveyor:

Certificate Number

EXHIBIT C					
State "A" A/C 2 Well No. 32Y					
480 acre Non-Standard Jalmat Gas Pool Spacing and Proration Unit					
Township 22 South, Range 36E, N.M.P.M.					
Section 9, 2050' FSL & 760' FWL (Unit L)					
WELL Name	Well No	Status	API No.	Sect/Twp/Rg/UL	Footage from Lease
State "A" A/C 2	40	P	30-025-08848	9 22S 36E A	990' FNL & 990' FEL
State "A" A/C 2	63	P	30-025-25543	9 22S 36E C	990' FNL & 2310' FWL
State "A" A/C 2	29	P	30-025-08854	9 22S 36E D	660' FNL & 660' FWL
State "A" A/C 2	57	P	30-025-20297	9 22S 36E G	1980' FNL & 1980' FEL
State "A" A/C 2	38	P	30-025-08847	9 22S 36E K	1980' FSL & 1980' FWL
State "A" A/C 2	67	P	30-025-28276	9 22S 36E K	2615' FSL & 1345' FWL
State "A" A/C 2	72	P	30-025-28281	9 22S 36E K	1410' FSL & 1440' FWL
State "A" A/C 2	1	P	30-025-08849	9 22S 36E N	660' FSL & 1980' FWL
State "A" A/C 2	4	P	30-025-08853	9 22S 36E M	660' FSL & 660' FWL
State "A" A/C 2	31	P&A	30-025-08856	9 22S 36E F	1980' FNL & 1980' FWL
State "A" A/C 2	52	P&A	30-025-08859	9 22S 36E B	660' FSL & 1980' FEL
State "A" A/C 2	32Y	P&A	30-025-08857	9 22S 36E L	2050' FSL & 760' FWL





7099 3220 0006 1554 4247

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only: No Insurance Coverage Provided)

Article Sent To:

Postage	\$ 77
Certified Fee	140
Return Receipt Fee (Endorsement Required)	125
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 342

Name (Please Print Clearly) (To be completed by mailer)
3114 Resources
Street, Apt. No., or PO Box No.
1308 Lake St. Ste 200
City, State, ZIP+4
Ft. Worth, TX 76102

PS Form 3800, July 1999 See Reverse for Instructions

7099 3220 0006 1554 4261

U.S. Postal Service
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(Domestic Mail Only: No Insurance Coverage Provided)

Article Sent To:

Postage	\$ 77
Certified Fee	140
Return Receipt Fee (Endorsement Required)	125
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 342

Name (Please Print Clearly) (To be completed by mailer)
Dico Farmhouse
Street, Apt. No., or PO Box No.
7506 E. 1210
City, State, ZIP+4
Ft. Worth, TX 76102-1610

PS Form 3800, July 1999 See Reverse for Instructions

7099 3220 0006 1554 4278

U.S. Postal Service
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Article Sent To:

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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 342

Name (Please Print Clearly) (To be completed by mailer)
737-25268728-29-1-LE03619946
Street, Apt. No., or PO Box No.
P.O. Box 552
City, State, ZIP+4
Ft. Worth, TX 76102

PS Form 3800, July 1999 See Reverse for Instructions

U.S. Postal Service
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(Domestic Mail Only: No Insurance Coverage Provided)

Article Sent To:

Postage	\$ 77
Certified Fee	140
Return Receipt Fee (Endorsement Required)	125
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 342

Name (Please Print Clearly) (To be completed by mailer)

Street, Apt. No., or PO Box No.

P.O. Box 140707

City, State, ZIP+4

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7099 3220 0006 1554 4254

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only: No Insurance Coverage Provided)

Article Sent To:

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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 342

Name (Please Print Clearly) (To be completed by mailer)

Dayle Hartman

Street, Apt. No., or PO Box No.

P.O. Box 10424

City, State, ZIP+4

PS Form 3800, July 1999

See Reverse for Instructions