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October 30, 1999

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Raptor Resources, Inc.
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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.