

(NE/4, NW/4, SW/4, and SE/4 of Section 11), would miss sands containing producible reserves and leave reserves in the ground, thereby causing waste; and

(iii) development of the Jalmat Gas Pool with more than one well per 160-acre tract is needed to assure that as many producible sands as reasonably possible are intersected by a wellbore.

(15) The engineering evidence presented by Raptor showed that substantial reserves have not been recovered by existing wells within its property due to inadequate completion practices in older wells, including inadequate treatment of perforated intervals and incomplete perforating of productive intervals, which has resulted in many of the productive intervals in the Yates and Seven Rivers formations, as well as other productive zones throughout the pool, being by-passed and not produced.

(16) Without this redevelopment, the properties in the Raptor 1999 and 2000 program would have produced approximately 3.1 million cubic feet of gas per day. However, as a result of the Raptor redevelopment program, these properties now produce at more than twice that rate.

(17) Raptor's engineering evidence also included information on the wells located on all 40-acre tracts offsetting the State "A" A/C-2 Wells No. 79 and 80. Although four wells produce from the 40-acre tracts in the Jalmat Gas Pool and the Eumont Gas Pool offsetting the State "A" A/C-2 Well No. 79, these wells produce at only marginal rates and cannot drain the NW/4 of Section 11. Although wells produce from the Jalmat Gas Pool on the 40-acre tracts offsetting the proposed State "A" A/C-2 Well No. 80, the geologic evidence on the area shows that the Yates and Seven Rivers formations are very heterogeneous in this area and a well in the SE/4 NW/4 of Section 11 is needed to produce the remaining recoverable reserves under this acreage.

(18) The drilling of the Raptor Resources, Inc. State "A" A/C-2 Wells No. 79 and 80 will enable applicant to recover reserves that otherwise will not be recovered.

(19) Raptor also testified that due to the heterogeneous nature of the Yates and Seven Rivers formations and the limited offsetting production, the proposed State "A" A/C-2 Wells No. 79 and 80 are needed to efficiently drain remaining reserves from this proration unit.

(20) The proposed State "A" A/C-2 Wells No. 79 and 80 are necessary to efficiently drain remaining recoverable reserves from this proration unit.