



**NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT**

September 17, 1999

Raptor Resources, Inc.
Attention: Bill R. Keathly
P. O. Box 160430
Austin, Texas 78716-0430

RE: Administrative application for an unorthodox infill Jalmat gas well location for the existing State "A" A/C-1 Well No. 81 (API No. 30-025-09295), located 660 feet from the North line and 1980 feet from the West line (Unit C) of Section 10, Township 23 South, Range 36 East, NMPM, Jalmat Gas Pool, Lea County, New Mexico.

Dear Mr. Keathly:

I am returning the subject application as incomplete. The information provided as to the size and configuration of the existing gas spacing and proration unit (320 acres comprising the W/2 of Section 10) does not correspond to our records, which indicates the existence of a 520-acre unit that comprises the S/2 NE/4, N/2 SE/4, and SE/4 SE/4 of Section 9 and the W/2 of Section 10, both in Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. Attached are copies of Division Orders No. R-9073 and R-9073-B and Division Administrative Orders NSL-2727, as amended, NSL-2729, as amended, and NSL-2731, as amended.

Sincerely,

Michael E. Stogner
Chief Hearing Officer/Engineer

MES/kv

cc: New Mexico Oil Conservation Division - Hobbs
New Mexico State Land Office - Santa Fe
Kathy Valdes - OCD, Santa Fe