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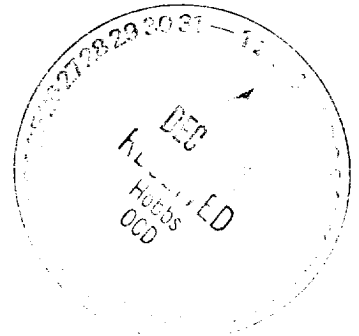
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November 28, 2001

**HAND-DELIVERED**

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 an unorthodox gas well location for its State "A" A/C-1 Well No. 60 at a point 1980 feet from the North and East lines of Section 13 Township 23 South, Range 36 East, NMPM, and the simultaneous dedication of this well and other existing producing Jalmat gas wells to a previously approved non-standard 640-acre spacing unit in the Jalmat Gas Pool, Lea County, New Mexico.

Dear Ms. Wrotenbery:

Pursuant to the provisions of the Special Rules and Regulations for the Jalmat Gas Pool as promulgated by Division Order No. R-8170, as amended, and the Amended Stipulated Declaratory Judgment issued by the First Judicial District Court of Santa Fe County, New Mexico on July 11, 2001, in Hartman v. Oil Conservation Commission (Cause No. D-0101-CV-9902927), Raptor Resources, Inc. hereby files its application for approval of its State "A" A/C-1 Well No. 60 to be re-entered in the Jalmat Gas Pool (Tansill-Yates-Seven Rivers) at a non-standard gas well location 1980 feet from the North and East lines of Section 13, Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. The approval of this application and the recompletion of this well in the Jalmat Gas Pool will result in spacing of less than 160 acres per well. Raptor also seeks the simultaneous