



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

OIL CONSERVATION DIVISION  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505  
(505) 827-7131

October 25, 1999

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

***Administrative Order NSL-2730-C (SD)***

Dear Mr. Keathly:

Reference is made to the following: (i) your initial applications submitted to the New Mexico Oil Conservation Division ("Division") on August 20 and September 15, 1999; (ii) the Division's response by letter from Mr. Michael E. Stogner, Engineer in Santa Fe, dated September 20, 1999 withdrawing both applications; (iii) your re-submittal of these applications to the Division on October 4, 1999; and (iv) the Division's records in Santa Fe: all concerning Raptor Resources, Inc.'s ("Raptor") request for two unorthodox Jalmat infill gas well locations within an existing non-standard 480-acre gas spacing and proration unit ("GPU") for the Jalmat Gas Pool comprising the NW/4 of Section 14 and the N/2 of Section 15, both in Township 23 South, Range 36 East, NMPM, Lea County, New Mexico. This GPU was established by Division Order No. R-9073, dated December 14, 1989 [Paragraph No. (12) of Exhibit "A"] and had dedicated thereon the following three wells:

- (1) State "A" A/C-1 Well No. 28 (API No. 30-025-09356), located at a standard gas well location 1650 feet from the North and West lines (Unit F) of Section 14;
- (2) State "A" A/C-1 Well No. 31 (API No. 30-025-10730), located at a standard gas well location 1650 feet from the North line and 990 feet from the East line (Unit H) of Section 14; and
- (3) State "A" A/C-1 Well No. 33 (API No. 30-025-10727), located at a standard gas well location 1650 feet from the North and West lines (Unit F) of Section 15.

(4)

By Division Administrative Order NSL-2730, dated December 7, 1989, as amended by order dated September 25, 1990, another well for this GPU, the State "A" A/C-1 Well No. 82 (API No. 30-025-10723), located at an unorthodox gas well location 660 feet from the North line and