

RAPTOR RESOURCES, INC.

901 Rio Grande

Austin, Texas 78701

(512) 478-4427

September 29, 1999

Mr. Michael Stogner
New Mexico Oil Conservation Division
2040 Pacheo
Santa Fe, New Mexico 87504

RE: Application for Unorthodox Gas Well Locations and Simultaneous Dedication
Jalmat, Tansil Yts 7 Rvrs (Pro Gas)
660' FNL and 990' FWL
Section 15, T 23S, R 36E (A)
Lea County, New Mexico

Dear Mr. Stogner,

Raptor Resources, Inc. respectfully requests your approval of this administrative application for the subject Unorthodox Gas Well Location and Simultaneous Dedication.


Raptor Resources, Inc. is planning to re-complete it's State "A" A/C 1 Well No. 90 in the Jalmat Tansil Yates 7-Rivers (Pro Gas Pool). It is our desire to also simultaneously dedicate the existing 480- acre Proration Unit, that comprises the NW of Section 14 and the N/2 of Section 15 both in Township 23 South, Range 36 East. Assigned to our well nos. 31, 33, 59, 80, 82 in Section 15 and wells 102 and 28 in Section 14 to all eight wells. Previously approved orders are R 9073, NSL 2730, NSL 2730 B and NSL 4361 A.

The offset operator plat shows that American Petrofina Co. of Texas, Arch Petroleum Inc, Conoco Inc and Westbrook Oil Corp, as the offset operators that could be affected by this unorthodox location. Please find enclosed evidence that they have been notified of this application.

In order to prevent waste, Raptor Resources, Inc. respectfully requests your approval of this application for an unorthodox location and simultaneous dedication. A copy of this letter and attachments has been furnished by Certified Mail to the offset operators as their notice of this application.

If you have any questions or require any further information concerning this application, please contact me at (915) 697-1609 or e-mail me at BRKeathly@juno.com.

Sincerely,



Bill R. Keathly
Regulatory Agent for Raptor Resources

Cc: Oil Conservation Division - Hobbs

**State "A" A/C 1 # 90
Section 15, T-23S, R-36E, (A)
API # 30-025-10722
Lea County, New Mexico**

RE: Application for Unorthodox Location

Notification of Offset Operators:

American Petrofina Co of Texas
P.O. Box 2990
Midland, TX 79702

Westbrook Oil Corp
P.O. Box 2264
Hobbs, NM 88241

Arch Petroleum Inc
P.O. Box 10340
Midland, TX 79702

Conoco Inc
10 Desta Dr., Ste 100W
Midland, TX 79705

Please find attached evidence that the above listed companies have been sent copies of the Non-standard location request.