



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

October 17, 2001

FOR REVIEW

Lori Wrotenbery  
Director  
Oil Conservation Division

Raptor Resources, Inc.  
c/o William F. Carr  
Holland & Hart L.L.P. and Campbell & Carr  
P. O. Box 2208  
Santa Fe, New Mexico 87504-2208

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*Administrative Order NSL-4654 (SD)*

Dear Mr. Carr:

Reference is made to the following: (i) your application on behalf of the operator, Raptor Resources, Inc. ("Raptor") dated August 20, 2001 (*application reference No. pKRV0-123456207*); and (ii) the New Mexico Oil Conservation Division's ("Division") records in Santa Fe, including the files on Division Administrative Order NSP-1811 (L) (SD) and Division Case No. 9775 (which resulted in the issuance of Division Order No. R-9073): all concerning Raptor's requests for an unorthodox Jalmat infill gas well location within an existing non-standard 440-acre gas spacing and proration unit ("GPU") for the Jalmat Gas Pool (79240) comprising the following described acreage in Lea County, New Mexico:

TOWNSHIP 23 SOUTH, RANGE 36 EAST, NMPM

Section 20: SE/4

Section 21: NE/4 SW/4, S/2 SW/4, and SE/4.

The rules and procedures currently governing the Jalmat Gas Pool include but are not necessarily limited to:

- (i) the "*Special Rules and Regulations for the Jalmat Gas Pool*," as promulgated by Division Order No. R-8170, as amended;
- (ii) Division Rule 605.B;
- (iii) Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999;
- (iv) Rule 1207.A (2); and
- (v) the amended Stipulated Declaratory Judgement of the First Judicial District Court in Santa Fe County, New Mexico issued on

