



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

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

November 22, 1999

Raptor Resources, Inc.
901 Rio Grande
Austin, Texas 78701
Attention: Bill R. Keathly, Regulatory Agent

Administrative Order NSP-1811(L)(SD)

Dear Mr. Keathly:

Reference is made to the following: (i) your three applications dated October 26, 1999; and (ii) the records of the New Mexico Oil Conservation Division ("Division") in Santa Fe, including the files on Division Order No. R-9073, issued in Case No. 9775 dated December 14, 1989: all concerning Raptor Resources, Inc.'s request for a 440-acre non-standard gas spacing and proration unit ("GPU") consisting of the following acreage in the Jalmat Gas Pool:

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.

It is our understanding that this unit is to be simultaneously dedicated to the following described wells:

- (1) existing State "A" A/C-1 Well No. 112 (API No. 30-025-24170), located at an unorthodox gas well location for the subject 440-acre GPU 2210 feet from the South line and 1650 feet from the East line (Unit J) of Section 21;
- (2) existing State "A" A/C-1 Well No. 113 (API No. 30-025-25446), located at a standard gas well location for this 440-acre GPU 990 feet from the South and East lines (Unit P) of Section 21; and
- (3) existing State "A" A/C-1 Well No. 114 (API No. 30-025-25538), located at a standard gas well location for this 440-acre GPU 1650 feet from the South line and 990 feet from the East line (Unit I) of Section 21.