

CAMPBELL, CARR, BERGE  
& SHERIDAN, P.A.  
LAWYERS

MICHAEL B. CAMPBELL  
WILLIAM F. CARR  
BRADFORD C. BERGE  
MARK F. SHERIDAN  
MICHAEL H. FELDEWERT  
TANYA M. TRUJILLO  
ROBERT J. SUTPHIN, JR.  

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JACK M. CAMPBELL  
1916-1999

JEFFERSON PLACE  
SUITE 1 - 110 NORTH GUADALUPE  
POST OFFICE BOX 2208  
SANTA FE, NEW MEXICO 87504-2208  
TELEPHONE: (505) 988-4421  
FACSIMILE: (505) 983-6043  
E-MAIL: law@westofpecos.com

December 18, 2000

**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

01 CONSERVATION DIV  
09 DEC 18 AM 4:37

Re: ***Application of Raptor Resources, Inc.. for Administrative Approval of an Non-Standard Gas Spacing Unit for its State "A" A/C Well No. 1, comprised of 40 acres in the SE/4 NW/4 of Section 21, Township 23 South, Range 36 East, N.M.P.M., Lea, New Mexico.***

Dear Ms. Wrotenbery:

Raptor Resources, Inc. pursuant to the provisions of Division Rule 104 D (2)(b) and (c) adopted on January 18, 1996, hereby seeks administrative approval of a non-standard gas spacing and proration unit in the Tansil, Yates and Seven Rivers, formations, Jalmat Gas Pool, comprised of 40 acres in the SE/4 NW/4 of Section 21, Township 23 South, Range 36 East, N.M.P.M., Lea County, New Mexico to be dedicated to its State "A" A/C Well No. 1.

This well was drilled and produced as an oil well until it was reclassified as a gas well effective January 1, 2000 well following the 1999 annual Gas-Oil Ratio Test. The well produces at low rates (less than 20 mcf/d). Accordingly, the State "A" A/C-1 Well No. 6 should drain the proposed non-standard 40-acre spacing and proration unit, but should not impair the correlative rights of any other interest owner in the Jalmat Gas Pool.