



STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

CASE NO. 10769

APPLICATION OF H. L. BROWN  
FOR AN UNORTHODOX OIL WELL LOCATION,  
ROOSEVELT COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by H. L. BROWN,  
JR. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

H. L. Brown Jr.  
P. O. Box 2237  
Midland, Texas 79702-2237  
Attn: Q. Peter Courtney  
(915) 683-5216

ATTORNEY

W. Thomas Kellahin  
KELLAHIN AND KELLAHIN  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285

OPPOSITION OR OTHER PARTY

ATTORNEY

None

## STATEMENT OF CASE

### APPLICANT

H. L. Brown, Jr. seeks approval to drill his Federal #27-2 Well at an unorthodox oil well location 330 feet FWL and 2590 feet FSL (Unit L) of Section 27, T7S, R37E, NMPM, North Bluit Siluro-Devonian Pool, Roosevelt County, New Mexico.

The N/2SW/4 of Section 27 is to be dedicated to said well forming a standard 80-acre oil spacing and proration unit.

The Special Rules and Regulations for the North Bluit Siluro-Devonian Pool ( Order R-8586) require wells to be located within 150 feet of the center of a quarter-quarter section.

The proposed well location is based upon a geologic seismic interpretation which projects that the well should penetrate the productive portion of the this portion of the pool at the highest point on the structure while a well at the closest standard location will be down structure.

Down structure location has the increased risk of being too close to the oil-water contact.

All owners in the subject spacing unit to the north also are owners in the adjoining spacing unit towards which the well encroaches. No violation of correlative rights should occur.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Q. Peter Courtney (land)	10 Min	3 exhibits
Jack Wells (geology)	20 Min.	4 exhibits
John Grey (P.E.)	15 Min.	2 exhibits

**PROCEDURAL MATTERS**

None applicable at this time.

KELLAHIN AND KELLAHIN

By: 

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