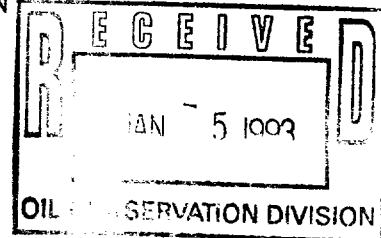


STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

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



CASE NO. 10649

**APPLICATION OF H.L. BROWN, JR.**  
FOR A UNIT AGREEMENT, LEA 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.  
Post Office Box 2237  
Midland, Texas 79702  
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. ("Brown"), Applicant, is the operator in a 640-acre tract consisting of the S/2 of Section 9 and the N/2 of Section 16, Township 15 South, Range 32 East, NMPM, which consists of five (5) separate State of New Mexico Oil and Gas Leases.

Brown seeks approval to form a voluntary exploratory unit, to be known as the North Feather State Unit, to consolidate the above tracts to drill a Morrow test in the Unit. There is a high probability that the well will be a Morrow oil well and not a gas well.

Initially, an oil well would be subject to a 40-acre state wide spacing unit and would be too small to justify the well.

The State Land Office has given preliminary approval of a unit so that the leases can be consolidated in order to provide flexibility in determining appropriate spacing and to provide orderly and efficient development which cannot take place without a unit.

OPPOSITION OR OTHER PARTY

NONE

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Q. Peter Courtney Landman	10 Minutes	Unit Agreement Land Plat Operating Agreement Preliminary State Land Office Letter of Approval
Jack Wells or Alternate Geologist	10 Minutes	Morrow Channel Map Morrow Cross Section Morrow Structure Map
George Sutphen Petroleum Engineer	10 Minutes	Reservoir Fluid Study AFE Drainage Calculations

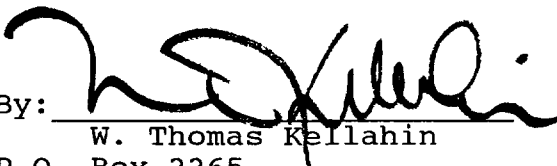
OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
SEE OPPOSITION FILING		

**PROCEDURAL MATTERS**

None applicable at this time.

KELLAHIN and KELLAHIN

By:   
W. Thomas Kellahin

P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285  
ATTORNEYS FOR H.L. BROWN, JR.