

(5) These sand bodies are part of a Morrow braided channel system in which the productive sand bodies are located on the eastern edge of a channel braid. (See Exhibits 2 and 3 enclosed).

(6) While all of these sand bodies are in the same correlative Morrow sand interval, each well in this vicinity is located in a different sand body ("a separate reservoir") as is evident by comparing the relative gas-oil ratios for these wells. (See Exhibit 3 enclosed).

(7) Brown's geologic conclusion is that a well drilled at the closest standard location would place the well in a non-productive channel bar while the proposed unorthodox well location has the best opportunity of encountering a productive sand body.

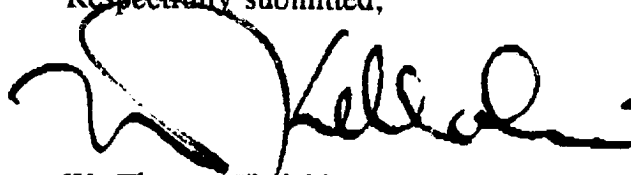
(8) In the event the Morrow is not capable of commercial production in this well, then Brown intends to test the Wolfcamp formation which will also be at an unorthodox well location.

(9) The opportunity to test for production from the Wolfcamp formation within this spacing unit can most economically be attempted with this wellbore rather than drilling another well to simply test the Wolfcamp.

(10) The offset operators towards whom the well encroaches are set forth on Exhibit 4.

WHEREFORE, H. L. Brown, Jr. requests that this matter be approved administratively by the Division.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W. Thomas Kellahin', with a large, stylized initial 'W'.

W. Thomas Kellahin
Kellahin and Kellahin
P.O. Box 2265
Santa Fe, New Mexico 87504-2265
(505) 982-4285
Attorneys for Applicant

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