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February 18, 2009

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OF COUNSEL: DAVID M. KAUFMAN † TAMMY PARKER PRATT ‡

Honorable James H. Welsh Commissioner of Conservation Office of Conservation P. O. Box 94275 Baton Rouge, Louisiana 70804-4275

Re:

Haynesville Zone, Reservoir A Converse Field

DeSoto and Sabine Parishes, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of Eagle Oil & Gas Co. for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Haynesville Zone, Reservoir A, in the Converse Field, DeSoto and Sabine Parishes, Louisiana, towit:

- 1. To create sixteen (16) drilling and production units for the Haynesville Zone, Reservoir A, to be designated the HA RA SUA through HA RA SUP, containing the identical area included within the said units, as shown on the attached plat.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed units, with each tract sharing in the unit production on a surface acre basis of participation.

- 3. To establish rules and regulations governing the exploration for and production of gas and condensate from the said units.
- 4. To designate a unit well and unit operator, as appropriate.
- 5. To provide that wells drilled to the Haynesville Zone, Reservoir A, in the Converse Field be located no closer than 330 feet to any unit line and that there be not less than 660 feet between wells drilling to, completed in, or for which a permit has been issued to, the Haynesville Zone, Reservoir A.
- 6. To provide that, with respect to horizontal wells drilled to the Haynesville Zone, Reservoir A, within the proposed units, in the event that the horizontal lateral portion of the well is cased and cemented back above the top of the Haynesville Zone, Reservoir A, the distance to any unit boundary will be determined based on the distance to the nearest perforation in the well, and not based on the penetration point or terminus.
- 7. To consider such other matters as may be pertinent to the Haynesville Zone, Reservoir A, in the Converse Field, DeSoto and Sabine Parishes, Louisiana.

The Haynesville Zone, Reservoir A, in the Converse Field, DeSoto and Sabine Parishes, Louisiana, is hereby defined as that interval seen between the electrical log depths of 11,310' and 12,758' in the Placid Oil Company – Cates No. 1 Well, located in Section 25, Township 9 North, Range 13 West, Sabine Parish, Louisiana.

All pertinent data relating to the above proposal may be obtained, <u>AT THE COST OF THE REQUESTING PARTY</u>, from David Comeaux, Leon E. Comeaux & Associates, Consulting Geologists, 305 La Rue France, Lafayette, Louisiana 70503, Phone No.: (337) 233-9839.

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A pre-application conference was held on Wednesday, February 11, 2009, at 10:30 o'clock A.M. A copy of the attendance list is attached hereto. The undersigned and David Comeaux represented the Applicant and explained the basis for the application. An opportunity for questions and answers was provided to those in attendance.

Wm. Timothy Allen, III, represented Comstock Oil & Gas, LLC, and expressed objection to the proposed Haynesville Zone RA SUA and also represented Vulcan Properties, LLC and expressed objection to the proposed Haynesville Zone RA SUB, SUC and SUD. The basis of the opposition was that his clients desired smaller units in order that they might develop their acreage. All rights were reserved.

J. William Fleming represented Petrohawk Corporation and expressed objection to the proposed Haynesville Zone RA SUB. The basis of the objection was that his client desired smaller units in order that it might develop its own acreage. All rights were reserved.

James L. Bullen and James F. Hardwick represented Ellora Energy, Inc., and expressed objection to the proposed Haynesville Zone RA SUC, proposing that a certain section be removed therefrom. The basis of the objection was that his client desired smaller units in order that it might develop its own acreage. Representatives of Ellora submitted a counterplan to reduce the proposed Haynesville Zone RA SUC and form additional units on a 640-acre pattern. All rights were reserved.

The objections could not be amicably resolved and the conference was then adjourned.

Attached hereto and made a part hereof is a plat outlining the proposed Haynesville Zone, Reservoir A, in the Converse Field, DeSoto and Sabine Parishes, Louisiana. Also enclosed herewith to the Commissioner of Conservation and District Manager is a list of the names and addresses of the Interested Owners, Represented Parties and Interested Parties to whom a copy of this notice is being sent; however, a copy of this list will be provided to any party upon request. A reasonable effort has been made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Applicant will provide for posting of a copy of the Legal Notice which issues in respect of this application, and of the enclosed plat, at a prominent place in the area affected, and will cause publication of the Legal Notice in a newspaper published in the general area of the Converse Field, all in accordance with the Revised Rules of Procedure. Additionally, Applicant will mail a copy of the Legal Notice to all

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Interested Owners, Represented Parties and Interested Parties promptly upon receipt of the Legal Notice from the Commissioner of Conservation.

In addition, enclosed herewith is our check payable to the Office of Conservation in the amount of \$755.00, in payment of the required hearing application fee.

Very truly yours,

OTTINGER HEBERT, L.L.C.

Patrick S. Ottinger

Attorney for Eagle Oil & Gas Co.

PSO/sd Enclosures

cc: Mr. Jim Broussard, District Manager

Interested Owners, Represented Parties and Interested Parties

