

JOSEPH ONEBANE (1917-1987)
JOHN G. TORIAN, II (1936-1991)

JAMES E. DIAZ, SR.
TIMOTHY J. MCNAMARA
EDWARD C. ABELL, JR.
LAWRENCE L. LEWIS, III †
ROBERT M. MAHONY
DOUGLAS W. TRUXILLO *
RANDALL C. SONGY
MICHAEL G. DURAND
GREG GUIDRY *
JOSEPH L. LEMOINE, JR. ††
MARK L. RILEY
GRAHAM N. SMITH *
GORDON T. WHITMAN
GARY P. KRAUS
RICHARD J. PETRE, JR.
CHARLES J. BOUDREAUX, JR.
THOMAS G. SMART
ROGER E. ISHEE **
STEVEN C. LANZA
JESSE D. LAMBERT ††*
BRENT G. SONNIER ***
GREG R. MIER ††
FRANK H. SPRUIELL, JR. *
MARIA FABRÉ MANUEL
MICHAEL P. MARAIST
JOAN LABBE BOUDREAUX

ONEBANE LAW FIRM

A Professional Corporation

SUITE 600 VERSAILLES BOULEVARD
102 VERSAILLES BOULEVARD (70501)
POST OFFICE BOX 3507
LAFAYETTE, LOUISIANA 70502-3507

FAX: (337) 266-1232
TDD: (337) 266-1217
TELEPHONE: (337) 237-2660

WWW.ONEBANE.COM

October 7, 2004

OF COUNSEL
WILLIAM E. KELLNER
MARK B. OLIVER
CRAIG A. RYAN
GREGORY K. MOROUX
FREDERICK R. PARKER, JR. ††
MICHAEL D. SKINNER
DANIEL C. PALMINTIER

SHREVEPORT OFFICE

400 TRAVIS STREET, SUITE 1000
SHREVEPORT, LA 71101

TELEPHONE: (318) 674-9770
FAX: (318) 674-9775

‡ LL.M. IN HEALTH LAW
† BOARD CERTIFIED TAX ATTORNEY
LL.M. IN TAXATION
†† REGISTERED PATENT ATTORNEY

* ALSO ADMITTED IN TEXAS
** ALSO ADMITTED IN MISSISSIPPI
*** ALSO ADMITTED IN OKLAHOMA

APPLICATION

9161-63743

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

Re: Substitute Unit Well
19100 TUSC RA SU FF
Profit Island Field
Pointe Coupee Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made of behalf of **PENNINGTON OIL & GAS INTERESTS, L.L.C.** for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of an order concerning the following matters pertaining to the **19,100' Tuscaloosa Sand, Reservoir A**, in the **Profit Island Field**, Pointe Coupee, West Baton Rouge, and East Baton Rouge Parishes, Louisiana, for which rules and regulations were established and drilling and producing units were created by Office of Conservation Order No. 1075-A, effective September 18, 1979, as amended and supplemented by the 1075-A Series of Office of Conservation Orders, to-wit:

1. To permit the applicant, Pennington Oil & Gas Interests, L.L.C., to drill, designate and utilize the Pennington Oil & Gas Interests, L.L.C. – Holden No. 1 Well as a substitute unit well for 19100 TUSC RA SU FF at the location shown on the plat attached hereto and made a part hereof, or any other location no closer than 330 feet to any unit boundary, which is in exception to the spacing provisions of the 1075-A Series of Office of Conservation Orders;

2. To the extent not inconsistent herewith, to continue in effect all pertinent provisions of the 1075-A Series of Office of Conservation Orders; and
3. To consider such other matters as may be pertinent to this application as shown by the evidence presented at the public hearing.

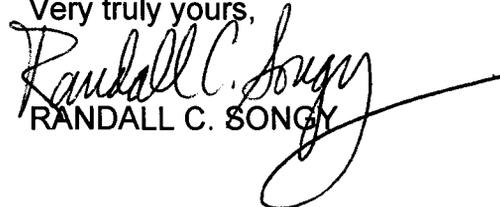
The 19,100' Tuscaloosa Sand, Reservoir A, in the Profit Island Field was previously defined in Office of Conservation Order No. 1075-A, effective September 18, 1979, and redefined several times in the 1075-A Series of Orders.

The current unit well for 19,100 TUSC RA SUFF, the J. V. Rougon No. 2 Well, is no longer producing, and the proposed substitute unit well is necessary to recover hydrocarbons beneath the unit which cannot be recovered by any other well.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **Harold P. "Chip" LeBlanc, Jr., with LeBlanc Geological, Inc., 3500 North Causeway, Suite 405, Metairie, Louisiana 70002, (504)-828-8700.**

There is attached hereto and made a part hereof a plat reflecting the proposed bottom hole location of the proposed substitute unit well, and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$755.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,

RANDALL C. SONGY

RCS/elg/bad/Enclosures

cc: Mr. Richard Hudson, District Manager
Office of Conservation

Interested Owners, Represented Parties
and Interested Parties

R 11 E

50

49

PROPOSED BHL

NAD 1927 (South Zone)

X = 1,985,452'

Y = 707,738'

T

98

5

S

48

NAD 83 (1992) South Zone

ORDER NO. 1075-A-2

LOUISIANA OFFICE OF CONSERVATION
PENNINGTON OIL & GAS INTERESTS, LLC
SUBSTITUTE UNIT WELL PLAT
POINTE COUPEE PARISH, LOUISIANA

PREPARED BY:
C. L. JACK STELLY & ASSOCIATES, INC.
LAFAYETTE, LOUISIANA
FILE NO. 19636-L10.DWG

SCALE: 1" = 1,000'

SEPTEMBER 30, 2004

