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September 22, 2005

APPLICATION

1282-63224

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

Re: 18,800' Tuscaloosa Sand, Reservoir A
Morganza Field
Pointe Coupee Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **ENERGY PRODUCTION CORPORATION** 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 **18,800' Tuscaloosa Sand, Reservoir A**, in the Morganza Field, Pointe Coupee Parish, Louisiana, to-wit:

1. To establish rules and regulations and to create two (2) additional drilling and production units for the exploration for and production of gas and condensate, to be designated 18,800 TUSC RA SU I and 18,800 TUSC RA SU P;
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 unit production on a surface acreage basis of participation;
3. To designate Energy Production Corporation as the unit operator for the proposed 18,800 RA SUI;

4. To designate a unit well for the proposed 18,800 TUSC RA SUI;
5. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation; and,
6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The 18,800' Tuscaloosa Sand in the Morganza Field, Pointe Coupee Parish, Louisiana, is hereby defined as being that gas and condensate bearing interval encountered between the depths of 18,844 feet and 18,930 feet, electrical log measurements, in the BP America Production Co. (Amoco) - Dorothy Brown #2 Well, located in Section 56, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana, and is further defined as being that gas and condensate bearing interval encountered between the depths of 18,772 feet and 18,860 feet, electrical log measurements, in the BP America Production Co. (Amoco) - F & L Planters No. 4 Well, located in Section 76, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana.

The exterior geographic boundaries of the proposed 18,800 TUSC RA SUI are identical to the exterior geographic boundaries of the existing 17,900 TUSC RA SUI, and the exterior geographic boundaries of the proposed 18,800 TUSC RA SUP are identical to the exterior geographic boundaries of the existing 17,900 TUSC RA SUP.

Pursuant to Rule 8 of the Rules of Procedure, the Commissioner of Conservation has waived the pre-application notice requirement. A pre-hearing conference to discuss this Application and any opposition thereto is hereby scheduled for 10:30 a.m. on Wednesday, October 5, 2005 at the Onebane Law Firm, 1200 Camellia Blvd., Suite 300, Lafayette, Louisiana 70508-6667 (Phone: 337-237-2660). It is not necessary that any party request holding of the conference, since the **CONFERENCE WILL BE HELD**.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting Mr. Frank Harrison, Jr., 200 Audubon Blvd., Lafayette, LA 70503 (Phone: 337-232-4031).

There is attached hereto and made a part hereof a plat of the proposed units. There is also attached hereto 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 and to the District Manager of the Lafayette District of the Office 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

All Interested Owners, Interested Parties and
Represented Parties

