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February 28, 2005

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\*\*\* 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: Spacing Exception  
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 the substitute unit well for 19100 TUSC RA SU FF, which was approved by Office of Conservation Order No. 1075-A-11, effective January 11, 2005, as a directional well at the surface and bottomhole locations shown on the plat attached hereto and made a part hereof, or any other location in the vicinity thereof (within 1000 feet), but no closer than 100 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 consider such other matters as may be pertinent to this application as shown by the evidence presented at the public hearing.

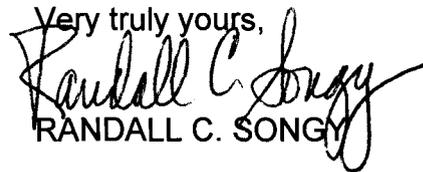
The 19,100' Tuscaloosa Sand, Reservoir A, in the Profit Island Field was previously defined in Office of Conservation Order No. 1075-A, effective September 18, 1979, and redefined several times in the 1075-A Series of Orders.

The substitute unit well which is the subject of this Application was approved by Order 1075-A-11 to be drilled as a straight hole. The Applicant has changed its drilling plans and now desires to drill it as a directional well, and therefore is requesting a spacing exception to allow for a tolerance from the intended bottomhole location.

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 surface and bottomhole 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

BP America  
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Pennington Oil & Gas  
Rougon

BP America  
Rougon

BHL X = 1,987,886  
Y = 705,231

Chevron Usa  
Rougon, J.

19960

SURF X = 1,987,636  
Y = 704,302

AREA OF DETAIL

19100' TUSC  
RA SU FF  
AS PER 1075-A-2

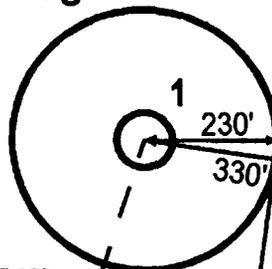
19100' TUSC  
RA SU U

19100' TUSC  
RA SU X

Chevron Usa  
Rougon, P.V. 20097

48

Pennington  
Rougon



BHL  
X = 1,987,886  
Y = 705,231

EXISTING UNIT WELL

EXHIBIT NO. DOCKET NO.

PENNINGTON OIL & GAS  
INTERESTS, LLC

PROFIT ISLAND FIELD  
POINTE COUPEE & WEST BATON ROUGE PARISHES, LA.

SPACING EXCEPTION  
19100' TUSC RA SUFF

0 2000 4000

LeBLANC GEOLOGICAL, INC.  
PETROLEUM GEOLOGY CONSULTING