

# BLANCHARD WALKER

A TRADITION OF EXCELLENCE SINCE 1917

BLANCHARD, WALKER, O'QUIN & ROBERTS  
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**WM. TIMOTHY ALLEN, III**  
Direct: 318.934.0217  
Email: tallen@bwor.com

February 7, 2007

Honorable James H. Welsh  
Commissioner of Conservation  
State of Louisiana  
Post Office Box 94275  
Baton Rouge, Louisiana 70804-9275

Re: HEARING APPLICATION  
Alternate Unit Wells  
JAMES RA SUC, JAMES RA SUJ, and JAMES RB SUM  
Spider Field  
DeSoto Parish, Louisiana  
Our File No. 410595.0031

Dear Sir:

On behalf of ST. MARY LAND & EXPLORATION COMPANY, application is hereby made for a public hearing to receive evidence concerning the issuance of an order pertaining to the following matters relating to the James Formation, Reservoirs A and B, in the Spider Field, DeSoto Parish, Louisiana:

1. To permit the applicant to drill, designate and utilize additional alternate unit wells for JAMES RA SUC, JAMES RA SUI and JAMES RA SUJ, at the locations shown on the plat attached hereto, or at any legal location within such units.
2. To permit the applicant to drill, designate and utilize an additional alternate unit well for JAMES RB SUM at the location shown on the plat attached hereto, or at any legal location within such unit.
3. To explicitly find that the proposed alternate unit wells are necessary to drain a portion of the James Formation, Reservoirs A and B, in the Spider Field underlying JAMES RA SUC, JAMES RA SUI, JAMES RA SUJ and JAMES RB SUM, which cannot be efficiently and economically drained by any existing well in such unit.
4. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

Office of Conservation  
February 7, 2007

The James Formation, Reservoir A, in the Spider Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 92-M, effective March 11, 2003.

The James Formation, Reservoir B, in the Spider Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 92-M-9, effective March 15, 2005.

The Rules of Procedure of the Commissioner of Conservation pertaining to the Pre-Application Notice requirements, are not applicable to the hearing requested herein, which requires legal notice of only ten (10) days.

Pertinent data concerning the intended application will be made available for inspection at the offices of St. Mary Land & Exploration Company, 330 Marshall Street, Suite 1200, Shreveport, Louisiana 71101. Any person wishing to inspect such data should call Mr. Kevin McMaster at (318)424-0804, during normal business hours or write Mr. McMaster at the above address, in order to arrange a date and time for such inspection. A copy of any such pertinent data can be obtained at the expense of the requesting party.

A list of the names and addresses of all Interested Owners, Represented Parties and Interested Parties (as defined in the Rules of Procedure) is attached hereto, and a copy of this notice, with the annexed plat, is being sent to each of such persons. A reasonable effort has been made to determine that the enclosed list includes all of the persons to whom this notice must be sent under the Rules of Procedure.

A check in the amount of \$3,020.00 made payable to the Commissioner of Conservation is enclosed herewith as the statutory fee for holding the requested hearing.

This application is being filed in duplicate, and a copy hereof is being sent to Mr. James C. Broussard, Shreveport District Manager of the Office of Conservation and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

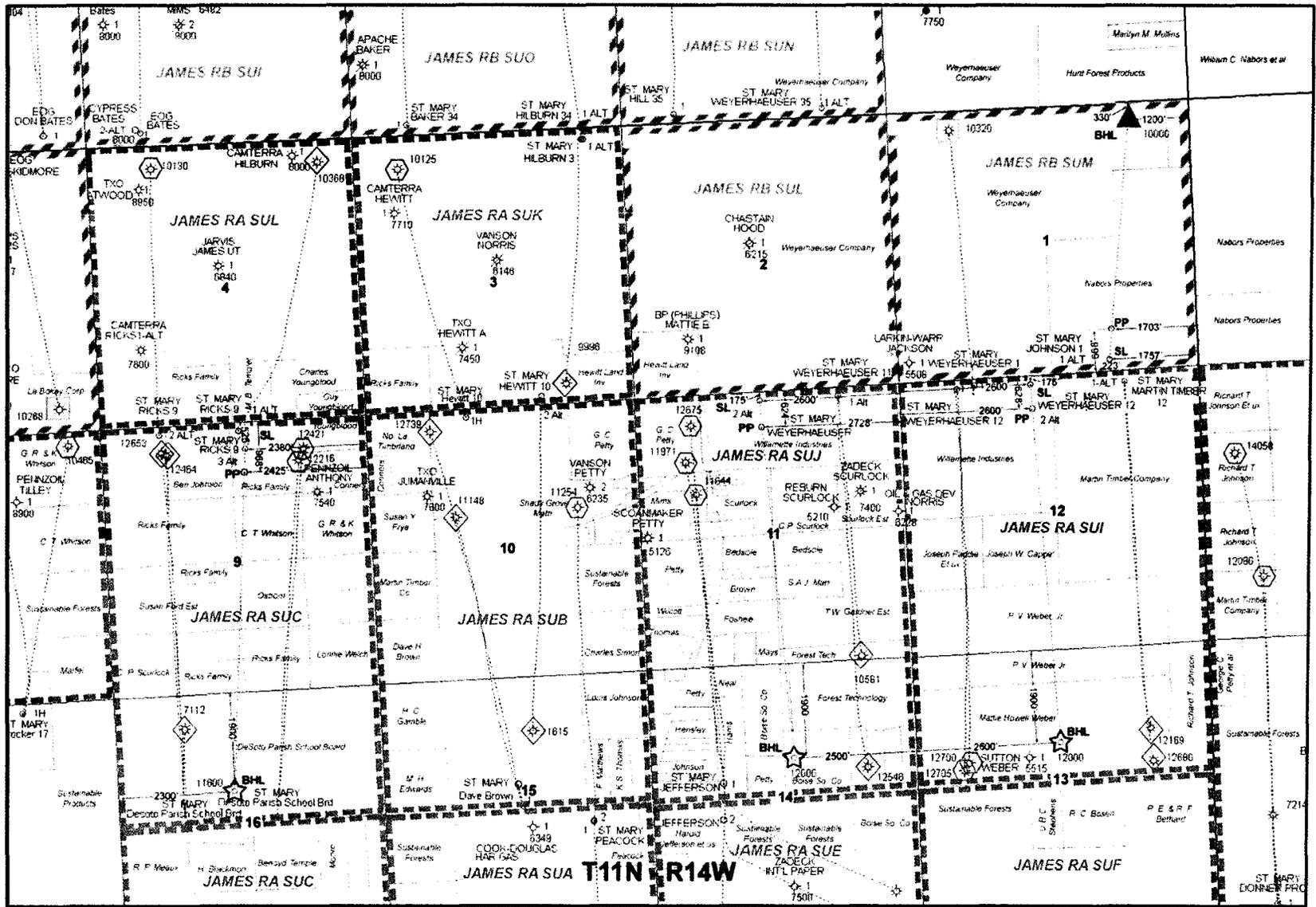
Very truly yours,

BLANCHARD, WALKER, O'QUIN & ROBERTS

By:   
Wm. Timothy Allen III  
Attorneys for St. Mary Land & Exploration Company

WTAlII/kmw  
Enclosures

cc: Mr. James C. Broussard, Shreveport District Manager,  
Office of Conservation (w/enclosures)  
Interested Owners, Represented Parties  
and Interested Parties (w/copy of plat only)



**LEGEND**

- Existing James RA units
- Existing James RA unit wells
- Existing James RA alternate unit wells
- Proposed James RA alternate unit wells
- Existing James RB units
- Existing James RB unit wells
- Proposed James RB alternate unit well

Docket No.  
Date  
Exhibit No. 1

ST. MARY LEASE & DEVELOPMENT CO.  
**SPIDER FIELD**  
DeSoto Parish, Louisiana  
**Proposed Alternate Unit Wells**  
for JAMES RA SUC, SUI, SUJ  
and JAMES RB SUM