

February 13, 2007

Honorable James H. Welsh
Commissioner of Conservation
Department of Natural Resources
Office of Conservation
P. O. Box 94275
Baton Rouge, Louisiana 70804-9275

RE: Sparta Sand, Reservoir A, SUA and SUB
Wilcox Zone, Reservoir A
ANDREPONT FIELD
St. Landry Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of Mannon L. Walters, Inc. to the Commissioner of Conservation for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the Sparta Sand, Reservoir A, SUA and SUB and the Wilcox Zone, Reservoir A, in the Andrepont Field, St. Landry Parish, Louisiana.

FOR THE SPARTA SAND, RESERVOIR A, SUA AND SUB

1. To dissolve the Sparta RA SUA and the Sparta RA SUB, in the Andrepont Field, as established by Office of Conservation Order No. 1117-A, effective January 10, 1995, and simultaneously therewith, to create revised units for the exploration for and production of oil and gas from the Sparta RA SUA and the Sparta RA SUB, in the Andrepont Field, St. Landry Parish, Louisiana.
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created.
3. To designate Mannon L. Walters, Inc. as operator of the Sparta RA SUA.
4. To designate the Mannon L. Walters, Inc. - Sebastien No. 1 Well as the unit well, at an exceptional location, for the Sparta RA SUA.
5. To provide that any wells drilled outside of the Sparta Sand, Reservoir A, shall be in accordance with the spacing provisions of Statewide Order No. 29-E.
6. To provide that the Commissioner may reclassify the reservoir by a supplemental order and without the necessity of a public hearing should such reclassification be warranted, based on evidence furnished the Commissioner.
7. To discuss any other matters that may be pertinent to this application.

The Sparta Sand, Reservoir A, in the Andrepont Field, St. Landry Parish, Louisiana, was fully defined under Office of Conservation Order No. 1117-A, effective January 10, 1995.

FOR THE WILCOX ZONE, RESERVOIR A

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Wilcox Zone, Reservoir A, in the Andrepont Field, St. Landry Parish, Louisiana.
2. To create a single drilling and production unit for this zone and to force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created.

3. To designate a unit operator and unit well for the unit so created.
4. To provide that any wells drilled outside of the Wilcox Zone, Reservoir A, shall be in accordance with the spacing provisions of Statewide Order No. 29-E.
5. To provide that the Commissioner may reclassify the reservoir by supplemental order and without the necessity of a public hearing should such reclassification be warranted, based on evidence furnished the Commissioner.
6. To discuss any other matters that may be pertinent to this application

The Wilcox Zone, Reservoir A, in the Andrepont Field, St. Landry Parish, Louisiana, is hereby defined as being that gas and condensate bearing zone encountered between the depths of 11,750' and 12,180' (electrical log measurements) in the Mannon L. Walters, Inc. - Sebastien No. 1 Well (SN 233154), located in Section 30, Township 5 South, Range 3 East, St. Landry Parish, Louisiana.

In addition to furnishing the legal notice to all Interested Parties, the applicant will provide for POSTING of the legal notice of the hearing and unit plat in a prominent place in the area of the Andrepont Field, St. Landry Parish, Louisiana, and will cause the legal notice of the hearing to be PUBLISHED in a newspaper of general circulation published in the vicinity of the Andrepont Field, St. Landry Parish, Louisiana, at least fifteen (15) days before the hearing date.

All pertinent data relating to the subject application can be obtained **AT THE COST OF THE REQUESTING PARTY**, from Mr. Bill McAlister at Leon E. Comeaux & Associates, P. O. Box 53922, Lafayette, Louisiana 70505 (337-233-9839).

In compliance with the Rules of Procedure, a preapplication conference was held in Lafayette, Louisiana, at 10:30 A. M. on Friday, January 12, 2007, at the office of Leon E. Comeaux & Associates, at which the parties named on the attached list were in attendance.

The conference was opened with a discussion by Mr. Bill McAlister, representing Mannon L. Walters, Inc., concerning the nature and purpose of the conference and the bases for the applicant's proposed units.

Mr. Tom McFarlain, representing the Dupre Family, presented a counterproposal on the Wilcox Zone going farther west than the applicant's. The parties were unable to resolve their differences and the meeting was adjourned, therefore, this matter may be contested.

There are attached hereto and made a part hereof a plats outlining the proposed units, the conference attendance list, and a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom this application is being sent. Pursuant to the Revised Rules of Procedure, such list of parties and proposed unit plats (**being the same plats attached to the December 21, 2006 preapplication notice**) are being furnished **ONLY** to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, said plat and the list of parties will be provided to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, there is enclosed our check on behalf of the applicant, Mannon L. Walters, Inc. in the sum of \$1510.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E. COMEAUX & ASSOCIATES



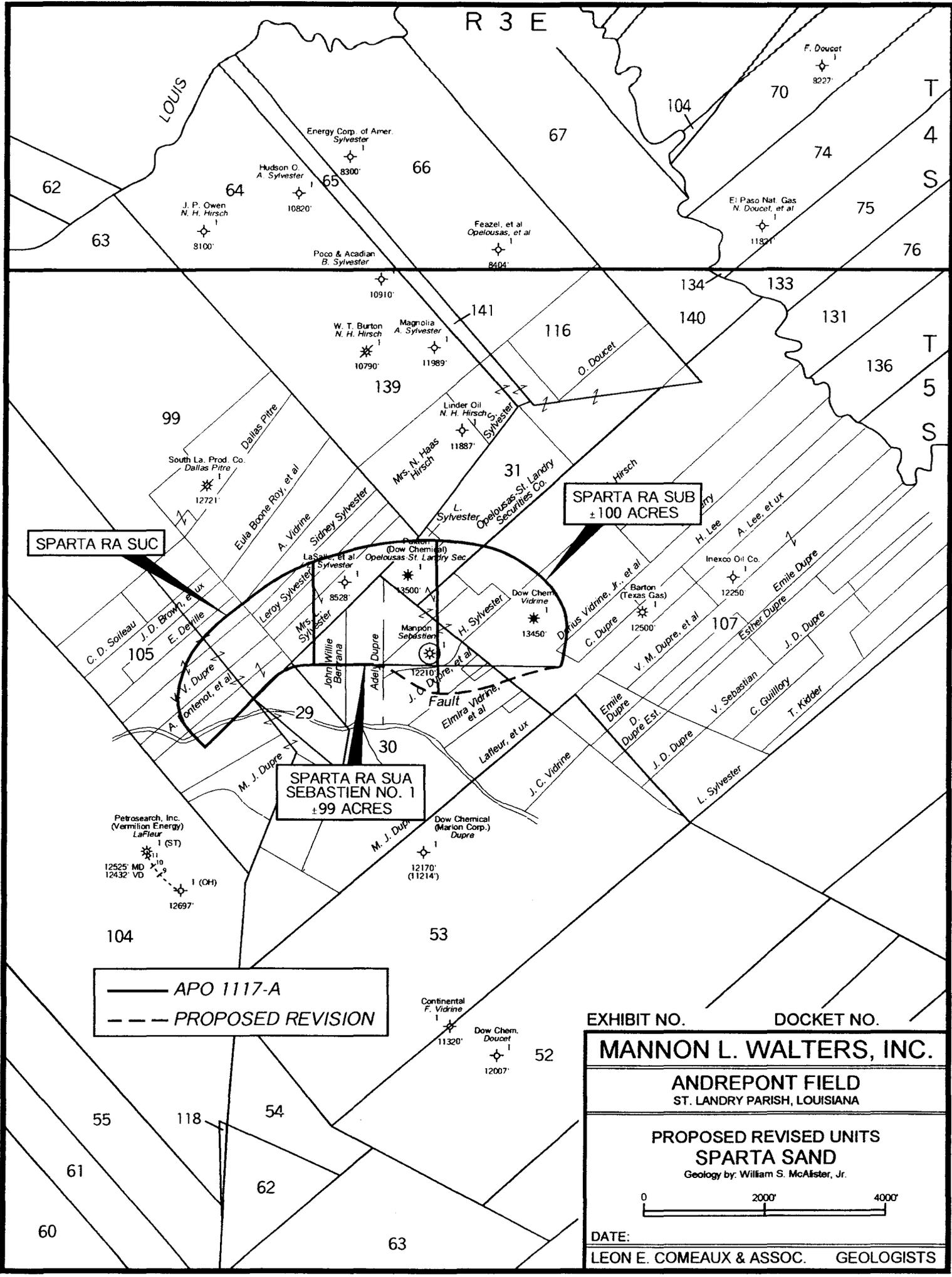
Bill McAlister

BM/cu

Enclosures

cc: Mr. Richard Hudson
Office of Conservation
825 Kaliste Saloom Road
Brandywine III, Suite 220
Lafayette, LA 70508-4284

Interested Parties, Interested
Owners and Represented Parties



SPARTA RA SUC

SPARTA RA SUB
±100 ACRES

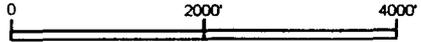
SPARTA RA SUA
SEBASTIEN NO. 1
±99 ACRES

— APO 1117-A
- - - PROPOSED REVISION

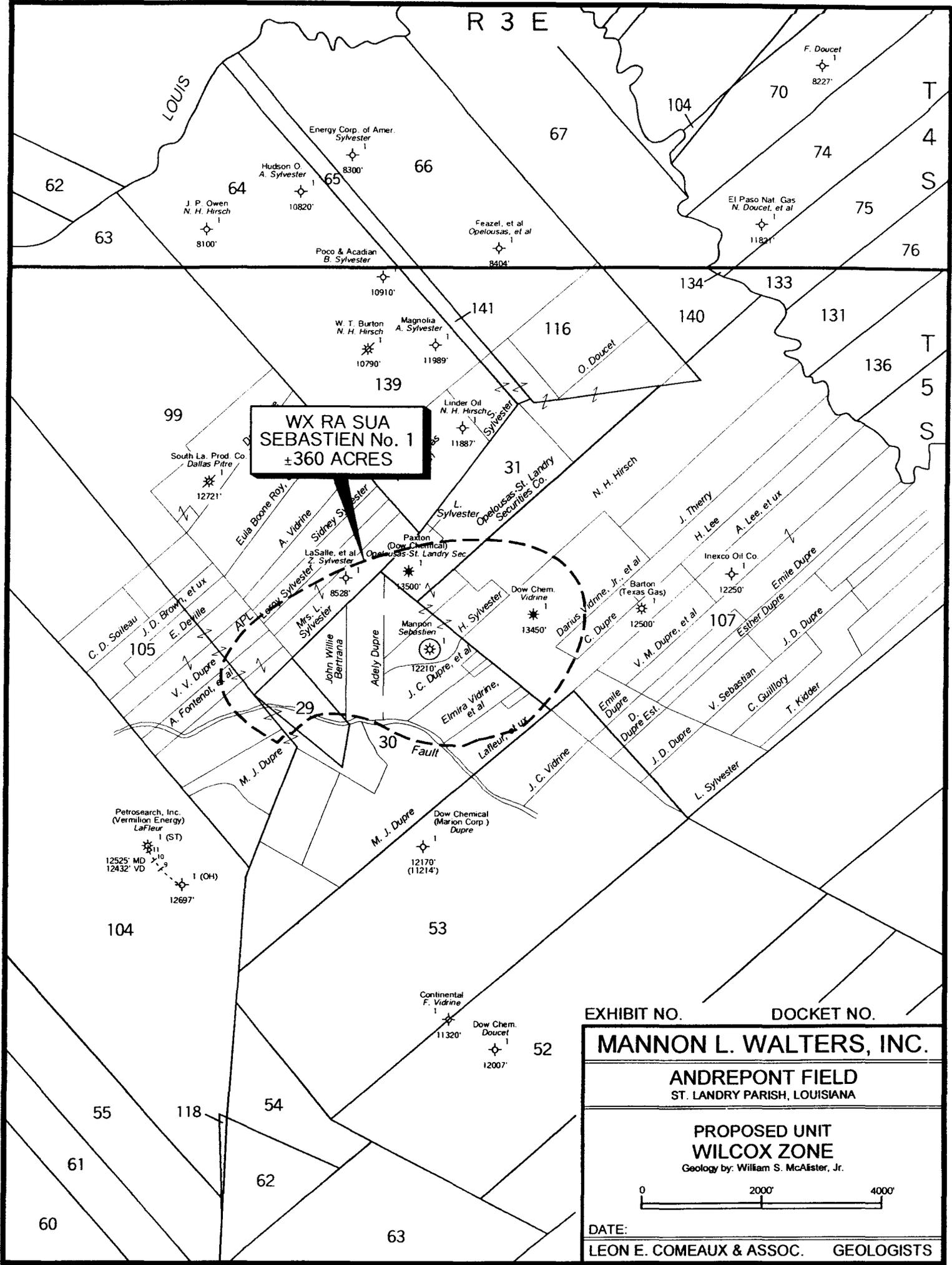
EXHIBIT NO. DOCKET NO.
MANNON L. WALTERS, INC.

ANDREPONT FIELD
ST. LANDRY PARISH, LOUISIANA

PROPOSED REVISED UNITS
SPARTA SAND
Geology by: William S. McAister, Jr.



DATE:
LEON E. COMEAUX & ASSOC. GEOLOGISTS



**WX RA SUA
SEBASTIEN No. 1
±360 ACRES**

EXHIBIT NO.	DOCKET NO.
MANNON L. WALTERS, INC.	
ANDREPONT FIELD ST. LANDRY PARISH, LOUISIANA	
PROPOSED UNIT WILCOX ZONE Geology by: William S. McAister, Jr.	
0 2000' 4000'	
DATE:	
LEON E. COMEAUX & ASSOC.	GEOLOGISTS