

DORROH & KENDRICK

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A Professional Law Corporation

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June 20, 2008

Hon. James Welsh
Commissioner of Conservation
P.O. Box 94275
Baton Rouge, LA 70804-9275

RE: Caspiana Field
CV RA SU128 AND HOSS RA SU 132
Justiss Oil Company SL 19027 16 No. 2 Well
Desoto Parish, LA

APPLICATION FOR PUBLIC HEARING

Dear Commissioner Welsh:

Application is hereby made on behalf of Justiss Oil Company, Inc., P.O. Box 2990, Jena, LA 71342, for a public hearing to consider evidence relative to the issuance of an order pertaining to the following matters:

1) As it relates to HOSS RA SU 132, to grant an exception to the spacing provisions of Order 191-B so as to permit the drilling and production of the "Justiss Oil Company SL 19027 16 No. 2" well at a location approximately 2664 feet from the West line and approximately 4058 feet from the South line of Section 16, Township 14 North, Range 12 West, Desoto Parish, Louisiana, which location is exceptional due to the fact that is located approximately 1544 feet from the "Justiss Oil Company SL 19027 16" well, the existing unit well.

2) As it relates to CV RA SU 128, to grant an exception to the spacing provisions of Order 191-A so as to permit the drilling and production of the "Justiss Oil Company SL 19027 16 No. 2" well at a location approximately 2664 feet from the West line and approximately 4058 feet from the South line of Section 16, Township 14 North, Range 12 West, Desoto Parish, Louisiana, which location is exceptional due to the fact that is located approximately 1544 feet from the "Justiss Oil Company SL 19027 16" well, the existing unit well.

3) To designate the "Justiss Oil Company SL 19027 16 No. 2" well as an alternate unit well for the HOSS RA SU 132 as defined and described by Order No. 191-B and Order No. 191-B-168 referenced hereinbelow at said exceptional location, and to permit the operator to produce the unit allowable from the existing wells on the unit, the proposed alternate unit well, or from any combination thereof, at its discretion, and to designate Justiss Oil Co., Inc. as the unit operator.

4) To designate the "Justiss Oil Company SL 19027 16 No. 2" well as an alternate unit well for the CV RA SU 128 as defined and described by Order No. 191-A and Order No. 191-A-175 referenced hereinbelow at said exceptional location, and to permit the operator to produce the unit allowable from the existing wells on the unit, the proposed alternate unit well, or from any combination thereof, at its discretion, and to designate Justiss Oil Co., Inc. as the unit operator.

5) To determine that the proposed location will effectively and efficiently drain a portion of the HOSS RA SU 132 which would not otherwise be drained, absent the approval of the exceptional location.

6) To determine that the proposed location will effectively and efficiently drain a portion of the CV RA SU 128 which would not otherwise be drained, absent the approval of the exceptional location.

7) To consider any and all other matters which the Commissioner of Conservation may deem appropriate and necessary under the circumstances.

Order 191-A was promulgated by the Office of Conservation on February 5, 1975, effective February 15, 1975, establishing rules and regulations and creating drilling and producing units for the Caspiana Field of Caddo and Desoto Parishes, Louisiana for the Cotton Valley Formation, Reservoir A. The order provides that additional wells located in the Caspiana Field, within or outside any of the units created thereby, should not be drilled within 660 feet of any unit boundary or within 2000 feet of any other well which has been permitted for, drilled to or completed in the same zone. CV RA SU 128 for Caspiana Field was created by Order 191-A-175, which was promulgated on June 14, 2007, effective May 15, 2007

The Cotton Valley A Zone, Reservoir A was fully and completely defined by Order 191-A as that interval encountered between the depths of 8400 feet and 9500 feet, as measured by the dual induction Laterolog run on the Tenneco Oil-Mobley-Pelto Oil-Eugene Turner Jr. No. 1 well, located in Section 13, Township 15 North, Range 13 West, DeSoto Parish, Louisiana.

Order 191-B was promulgated by the Office of Conservation on April 22, 1975, effective April 15, 1975, establishing rules and regulations and creating drilling and producing units for the Caspiana Field of Caddo and Desoto Parishes, Louisiana for the Hosston Formation, Reservoir A. The order provides that additional wells located in the Caspiana Field, within or outside any of the units created thereby, should not be drilled within 660 feet of any unit boundary or within 2000 feet of any other well which has been permitted for, drilled to or completed in the same zone. HOSS RA SU 132 for Caspiana Field was created by Order 191-B-168, which was promulgated on June 14, 2007, effective May 15, 2007.

The Hosston Formation, Reservoir B was fully and completely defined by Order 191-B as that interval encountered between the subsurface depths of 6016 feet and 8276 feet, as measured by electric log run on the Tenneco Oil-Mobley-Pelto Oil-Eugene Turner Jr. No. 1 well, located in Section 13, Township 15 North, Range 13 West, DeSoto Parish, Louisiana.

The applicant attaches hereto two plats showing the location for which this special permit is sought for each of the respective zones.

Inasmuch as the matters covered by this application do not require a pre-application notice, no such notice has been given and it is requested that the hearing be held after the necessary ten day delay following legal advertisement.

In accordance with the Rules of Procedure, the applicant has made a diligent effort to obtain the names and addresses of all interested owners and represented parties to whom notice of this application should be sent and a list of such names is attached hereto.

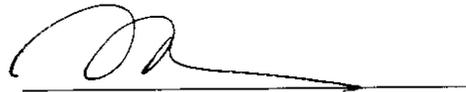
The applicant will also cause a copy of the legal notice to be published in a newspaper of general circulation in Desoto Parish, Louisiana and shall post a copy of the notice in a prominent place in the Desoto Parish Courthouse.

A copy of this letter, the attached plat and list of interested owners and represented parties 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.

Also enclosed is a check in the amount of \$1510.00 in payment of the required filing fees.

Yours Very Truly,

DORROH & KENDRICK, A PLC



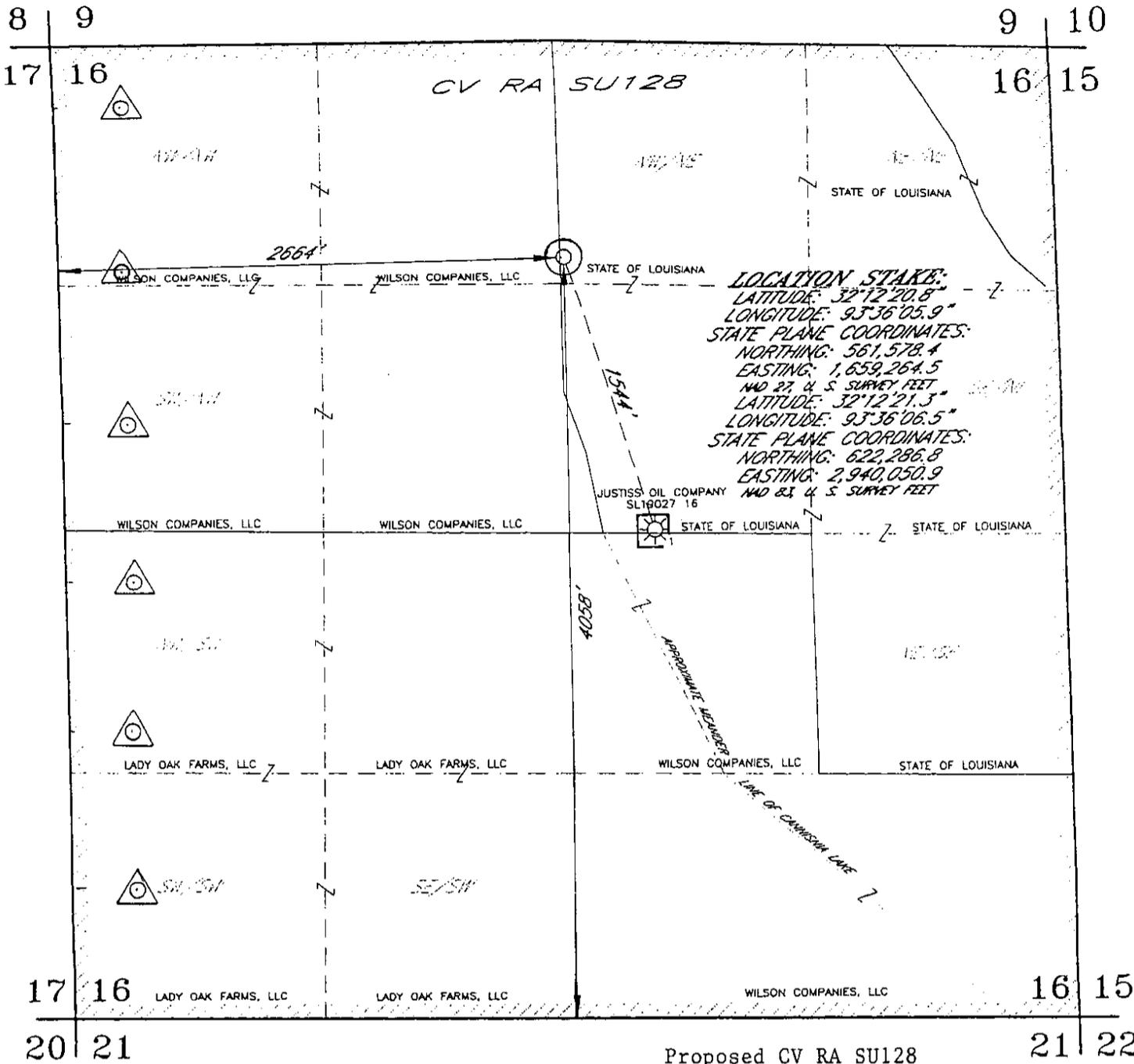
By: STEVEN P. KENDRICK

xc: Office of Conservation
Shreveport District Office
1525 Fairfield Avenue
Suite 668
Shreveport, LA 71101-4388

Enclosures (plat and list of interested owners and represented parties)

xc: Interested Owners, Represented Parties,
and Interested Parties (w/copy of plats)

T 14 N - R 12 W



LOCATION STAKE:
 LATITUDE: 32°12'20.8"
 LONGITUDE: 93°36'05.9"
STATE PLANE COORDINATES:
 NORTHING: 561,578.4
 EASTING: 1,659,264.5
 AND 27.4 S. SURVEY FEET
 LATITUDE: 32°12'21.3"
 LONGITUDE: 93°36'06.5"
STATE PLANE COORDINATES:
 NORTHING: 622,286.8
 EASTING: 2,940,050.9
 AND 83.4 S. SURVEY FEET

NOTES:

- (1) LATITUDE AND LONGITUDE FROM HAND-HELD GPS UNIT.
- (2) LOCATION STAKE LOCATED ON 1992 PROVISIONAL EDITION OF UNITED STATES GEOLOGICAL SURVEY, CLEAR LAKE, LOUISIANA 7.5' QUADRANGLE MAP.
- (3) VERTICAL DATUM - NATIONAL GEODETIC VERTICAL DATUM OF 1929.
- (4) HORIZONTAL DATUM - 1927 NORTH AMERICAN DATUM.
- (5) SURFACE AND MINERAL OWNERSHIP PROVIDED BY CLIENT.
- (6) EXISTING WELLS AND THEIR STATUS SPOTTED ON PLAT FROM RECORD CALLS.
- (7) NO INVESTIGATION MADE BY THIS SURVEYOR FOR FRESH WATER WELLS.
- (8) NO STRUCTURE LOCATED WITHIN 500' OF LOCATION STAKE.

CERTIFICATION - I HEREBY CERTIFY THAT THIS PLAT CORRECTLY REPRESENTS MY SURVEY.

Clarence M. Bruce
 CLARENCE M. BRUCE, LA P.L.S. NO. 4256
 NOTE: ORIGINAL IF STAMPED RED, SIGNED BLUE.

- Proposed CV RA SU128
- Alternate Unit well at Exceptional Location
- Existing Unit Well
- △ Existing Alternate Unit Well

//// CV RA SU 128
 SECTION 16, T14N-R12W
 UNIT OUTLINE

- THIS SURVEY DOES NOT CONSTITUTE:
1. ENVIRONMENTAL SITE ASSESSMENT
 2. WETLANDS DETERMINATION
 3. SUB-SURFACE INVESTIGATION CALL LOUISIANA ONE CALL 1-800-272-3020 BEFORE DIGGING.
 4. CERTIFICATION OF UN-ENCUMBERED OWNERSHIP
 5. A PROPERTY BOUNDARY SURVEY NOR DOES IT MEET MINIMUM STANDARDS FOR A PROPERTY BOUNDARY SURVEY.

LEGEND

- ⊕ - D&A
- - OIL
- ⊙ - P&A
- ☀ - GAS
- ⊙ - SWD
- ☀ - GAS P&A
- () - SURFACE OWNERSHIP
- - STAKED NOT DRILLED

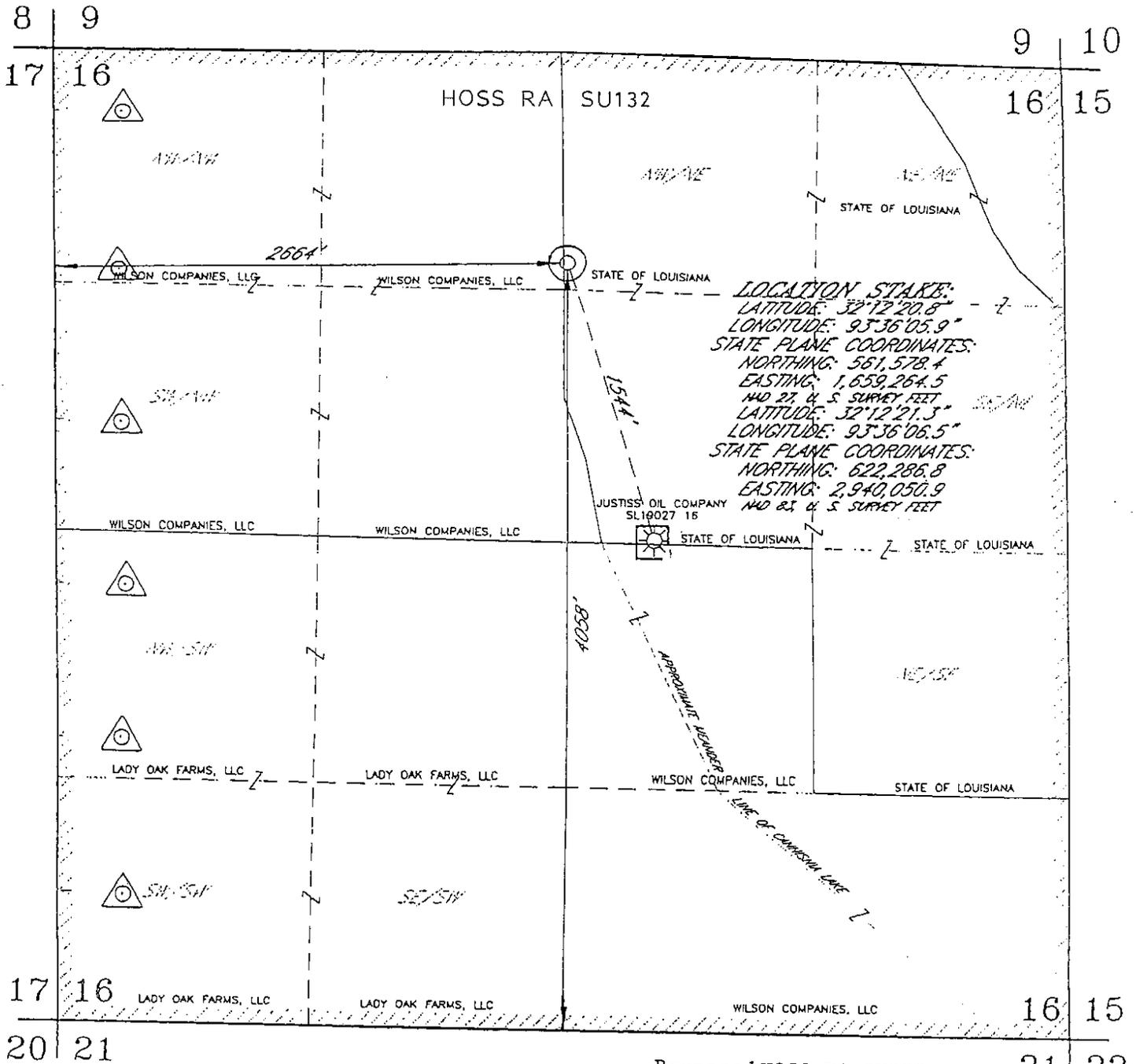
SURVEY PLAT SHOWING

JUSTISS OIL COMPANY, INC.
CV RA SU128; SL19027 16 NO. 2

DESCRIPTION
 4058' FSL & 2664' FWL OF SECTION 16, T14N-R12W, LOUISIANA PRINCIPAL MERIDIAN, NORTH WESTERN LAND DISTRICT LAND DISTRICT, DESOTO PARISH, LOUISIANA.

| | | | | | |
|-----------------------|--------------|-------------------------------|------------------------------------|-------------|--|
| SURVEY DATE 5/21/2008 | REVISED DATE | PRE-CONST. ELEV. GRD = 138.8' | AREA MAP T12N-R1W | DWG. BY SMF | N & A, INC. NOWLIN & ASSOCIATES, INC. CONSULTING ENGINEERS - LAND SURVEYORS NATCHITOCHEES, LOUISIANA JENA, LOUISIANA PH NO (318) 992 - 0389 OR 980 - 5252 |
| SCALE 1" = 800' | DESC. | POST-CONST. ELEV. | PROJECT NO. 283.123 | APP. BY CNB | |
| FB/PG DESOTO 2/35 | | CLASS D SURVEY | FILE C:\ACAD\283\283123\283123.DWG | | |

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