

# GORDON

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August 4, 2008

Ref: 4641-24928

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

Re: Hearing Application  
11350' Zone, Reservoirs A, B, C and D  
CC-8 Zone, Reservoirs A and B  
LAKE WASHINGTON FIELD, Plaquemines Parish, Louisiana  
Applicant: Swift Energy Operating, LLC

Dear Mr. Commissioner:

In accordance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, application is hereby made on behalf of **Swift Energy Operating, L.L.C.** 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 11350' Zone, Reservoirs C and D, and CC-8 Zone, Reservoirs A and B, Lake Washington Field, Plaquemines Parish, Louisiana.

#### 11350' Zone, Reservoirs A, B, C and D

1. To create two (2) single drilling and production units of approximately 160 acres each for the 11350' Zone, Reservoirs C and D designated as the 11350' RC SUA and 11350' RD SUA in the Lake Washington Field, Plaquemines Parish, Louisiana, all as shown more particularly on the attached plat;
2. To establish rules and regulations governing the exploration for and production of oil and gas from the said sand units;
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created, with each tract sharing in unit production on a surface acreage basis of participation;
4. To redefine the 11350' Zone, created by Office of Conservation Order No. 149-AAAA, effective June 27, 2006;
5. To find that, except to the extent contrary in the order granted by the Commissioner of Conservation in connection with the hearing held on this application, the provisions of Series of Office of Conservation Nos. 149-AAAA remain in full force and effect, and
6. To consider such other matters pertinent to this application as shown by the evidence presented at the hearing held on this matter.

The 11350' Zone, in the Lake Washington Field, Plaquemines Parish, Louisiana was previously defined by Office of Conservation Order No. 149-AAAA, effective June 27, 2006, 2004, and is hereby redefined as being that oil and gas bearing zone encountered between the measured depths of 11,510 feet and 12,797 feet (-11,459' to -12,708' subsea) (electrical log measurements) in the Swift Energy Operating-State Lease 17990 No. 9 Well, located in Section 10, Township 20 South, Range 26 East, Plaquemines Parish, Louisiana, and further defined as being that oil and gas bearing zone encountered between the measured depths of 14,360 feet and 15,870 feet (electrical log measurements) in the John W. Mecom and Freeport Oil Co.-State Lease 2155 No. 2 Well located in Section 16, Township 20 South, Range 26 East, Plaquemines Parish, Louisiana.

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CC-8 Zone, Reservoirs A and B

1. To create two (2) single drilling and production units of approximately 160 acres each for the CC-8 Zone, Reservoirs A and B designated as the CC-8 RA SUA and CC-8 RB SUA in the Lake Washington Field, Plaquemines Parish, Louisiana, all as shown more particularly on the attached plat;
2. To establish rules and regulations governing the exploration for and production of oil and gas from the said sand units;
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the units so created, with each tract sharing in unit production on a surface acreage basis of participation;
4. To consider such other matters pertinent to this application as shown by the evidence presented at the hearing held on this matter.

The CC-8 Zone, in the Lake Washington Field, Plaquemines Parish, Louisiana is hereby defined as being that oil and gas bearing zone encountered between the measured depths of 14,288 feet and 14,597 feet (-14,228' to -14,537' subsea) (electrical log measurements) in the Swift Energy Operating-State Lease 18907 No. 3 Well, located in Section 9, Township 20 South, Range 26 East, Plaquemines Parish, Louisiana, and further defined as being that oil and gas bearing zone encountered between the measured depth of 15,870 feet (electrical log measurements) and the base not reached in the John W. Mecom and Freeport Oil Co.-State Lease 2155 No. 2 Well located in Section 16, Township 20 South, Range 26 East, Plaquemines Parish, Louisiana.

In compliance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, a pre-application conference was held in Lafayette, Louisiana on July 14, 2008. Attached hereto and made a part hereof is a list of the names and addresses of the parties who were in attendance at that conference.

The conference was opened by Mr. B. J. Duplantis. Mr. Remy Williams of W. H. Robbins & Associates presented the plan of applicant. Questions were asked and answered. Mr. Bill McAlister on behalf of Hilcorp Energy presented a counterplan to divide the 11350 RC SUA and the CC-8 RA SUA into two (2) units along the lease lines. The parties will continue to attempt to reconcile their differences. It appears that there may be opposition to the applicant's proposal at the public hearing.

Attached hereto and made a part hereof are plats outlining the 11350 RA SUA, 11350 RB SUA, 11350 RC SUA and 11350 RD SUA and CC-8 RA SUA and CC-8 RB SUA, Lake Washington Field, Plaquemines Parish, Louisiana, and a list of the names and addresses of the interested owners, represented parties and interested parties to whom this notice is being sent. It is hereby certified that a reasonable effort was made to ascertain the names and addresses of all interested owners, represented parties and interested parties.

A copy of the list of the names and addresses of the interested owners, represented parties and interested parties is not being mailed to those parties along with this hearing application. Should any such party desire a copy of this list, however, we will be glad to provide one upon request.

Upon receipt of the legal notice in the captioned matter, the notice will be posted, published and mailed in accordance with Rule 7 of the Rules of Procedure.

Any pertinent data relating to the proposed units can be obtained, AT THE COST OF THE REQUESTING PARTY, from Mr. Remy Williams of W. H. Robbins & Associates, 302 La Rue France, Suite 100, Lafayette, LA 70508 (337) 232-5004.

Finally, there is enclosed herewith our check on behalf of the applicant in the amount of \$1,510.00, made payable to the Office of Conservation, representing the required hearing application fee.

Very truly yours,

  
B. J. Duplantis

BJD/ht

Attachments

cc: Mr. Richard Hudson, District Manager, Office of Conservation

All Interested Owners, Represented Parties  
and Interested Parties

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