

LISKOW & LEWIS

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August 15, 2008

Richard W. Revels, Jr.
rwrevels@liskow.com

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

Re: Simon Zone, Reservoir B
Cossinade Field
Vermilion Parish, Louisiana
Establish rules and regulations

Dear Commissioner Welsh:

Application is hereby made on behalf of **BTA OIL PRODUCERS, LLC** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matter:

1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of gas and condensate from the Simon Zone, Reservoir B, in the Cossinade Field, Vermilion Parish, Louisiana, said unit to be designated SIMON RB SUA, as shown on the plat attached hereto and made a part hereof.
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
3. To provide that any wells drilled to the Simon Zone, Reservoir B, within or outside the unit created herein, should be located in accordance with the provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
4. To provide that the Commissioner of Conservation should be authorized to reclassify the aforementioned zone and reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of such reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
5. To consider such others matters as may be pertinent.

The Simon Zone, in Cossinade Field, is hereby defined as being that gas and condensate bearing zone encountered between the depths of 12,062 feet and 13,140 feet (electrical log

August 15, 2008

measurements) in the Sohio Petroleum Company – Hubert Simon et al No. 1 Well, located in Section 33, Township 11 South, Range 2 East, Vermillion Parish, Louisiana,

Any pertinent data, including well logs, not available from the Office of Conservation, may be obtained **AT THE COST OF THE REQUESTING PARTY** from Louis Gilbert & Associates, 3636 North Causeway Blvd., Suite 204, Metairie, LA 70002, Telephone Number (504)834-8112.

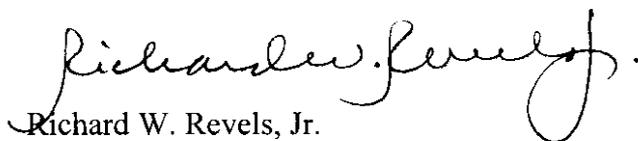
Pursuant to the Rules of Procedure, a joint pre-application conference was held on July 10, 2008, in Lafayette, Louisiana, at which the parties on the attached list were in attendance. The conference was opened by a representative of Fleetwood Resources, Inc., followed by presentations by both BTA Oil Producers and Kinnickinnick Exploration. Each of the plans was explained and questions were asked and answered. Differences between these three parties could not be resolved at the conference which was then adjourned. After further discussions between these three parties since the conference, differences have been resolved, resulting in the compromise unit proposal with is attached hereto and made a part hereof. Should any interested party receiving a copy of this application wish to consult, please call the undersigned. We are not aware of any remaining opposition to the compromise proposal.

Attached hereto and made a part hereof is a revised plat outlining the applicant's proposal, the conference attendance list, and a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being mailed. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be furnished 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, enclosed is our check in the amount of \$755.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,

LISKOW & LEWIS


Richard W. Revels, Jr.

RWRjr/dbf
Enclosures

cc: Mr. Richard Hudson, Lafayette District Office of Conservation
cc: Interested Owners, Represented Parties and Interested Parties

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ARCO Hardy
18,718'

L.L.&E. Simon
14,050'
BURLINGTON Simon
14,500'

Chad Anthony Buford, Etal

ENTEX Landry
18,500'

ARCO Faulk
17,666'
Lena Marie Broussard, Etal
Whitney J. Simon, Etal
LEGACY Faulk
14,021'

GERMANY Reynaud
14,000'

Landry
11,195'

Justin Francis Buford, Etal

Darrel Richard, Etal

Tricia Nichole Touchet, Etal
Mary Ann Richard, Etal

Whitney J. Simon, Etal

LEGACY Faulk
14,021'

Raymond Lewis Clark, Etux

Eula Mae Leger Sonnier
11,610'

UNOCAL (0')
Dorothy Bell Trahan
DAVIS Trahan
14,199'

ARCO Simon-Villemez
14,500'

**SIMON RB SU A
(Undrilled)
+/- 504 Acres**

Brenda Gay Larmand Couvillon, Etal

Anna Viella Landry Simon

Adam Leger, Jr., Etal

Cecelia Leger Labbe
18,400'

Ricky Mitchell Perry, Etux

Beaulieu, L.L.C.

Jagdish Gupta, Etux

Rodney & Wilda Simon 1992 Family Trust

Neva Bell Faulk, Etal

L.L.&E. Sonnier
14,500'

Allen Dale Sanchez, Etux

Frankie J. Dubois, Etux

SOHIO Blanchard

HUNT Faulk
18,820'

Virginia Villemez Kendall, Etal
14,500'

Joseph D. LeBlanc, Etux

Annie May Nunez Labry, Etal

H.L. Suire, Etal

HUNT Faulk
(104')

SOUTHPORT Simon
15,067'

The Richard Living Trust of 1995, Etal

Dennis Joseph Broussard, Etal

D.M. Blanchard, Etal

HUNT Faulk
(166')

N. MICHIGAN Mire
14,402'

Marie Elina Leger Livaudois, Etal

TEXACO Leger
12,750'

SOUTHPORT Helen Simon
18,277'

SOHIO Simon
15,294'

SOUTHPORT Mire
14,612'

Beverly Labry Schexnaider, Etal

N. CENTRAL Simon

M.E. Gunbooy
14,729'

Karl Ray Comeaux, Etal

SOUTHPORT Mire
14,580'

SOUTHPORT Vincent

J. Thomas Trahan, Etal

SOHIO Mire
12,743'

Larry James Primeaux, Etux

SOUTHPORT Mire
14,984'

Marie Elina Leger Livaudois, Etal

SOHIO Mire
14,764'

SOHIO Mire
12,743'

Paul Norris Mire

SOUTHPORT Mire
14,612'

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Paul Norris Mire

SOUTHPORT Mire
14,612'

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- PROPOSED UNIT
- △ - SIGNIFICANT WELL
- (104') - DISTANCE FROM SIGNIFICANT WELL TO UNIT BOUNDARY
- - SIGNIFICANT POINT

Geo-Draft, Inc.
(504) 838-2882

NOTE: ALL UNIT BOUNDARIES ARE GEOGRAPHIC

EXHIBIT No. DOCKET No.

BTA OIL PRODUCERS, LLC

**COSSINADE FIELD
VERMILION PARISH, LOUISIANA**

Proposed Unit
Simon Zone, Reservoir B

Date:

0' 2000' 4000' 6000'

Geology: LOUIS GILBERT & ASSOCIATES, INC.