

COOK, YANCEY, KING & GALLOWAY

A PROFESSIONAL LAW CORPORATION

333 TEXAS STREET, SUITE 1700

POST OFFICE BOX 22260

SHREVEPORT, LOUISIANA 71120-2260

www.cookyancey.com

J. William Fleming

Writer's Direct

(318) 227-7724

bill.fleming@cookyancey.com

August 31, 2008

TELEPHONE (318) 221-6277

TELECOPIER (318) 227-7850

When calling relative to this matter
refer to No. 1615.

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

RE: **Upper Hosston Formation, Reservoir A
Lower Hosston Formation, Reservoir A
Cotton Valley Formation, Reservoir A
Lower Hosston Formation, Reservoir B
Cotton Valley Formation, Reservoir B
Haynesville Zone, Reservoir B
Belle Bower Field
DeSoto Parish, Louisiana**

APPLICATION FOR PUBLIC HEARING

Dear Sir:

Will-Drill Production Co., Inc. hereby makes application pursuant to the revised rules of procedure for a public hearing to consider evidence relating to the following matters pertaining to the Upper Hosston Formation, Reservoir A; the Lower Hosston Formation, Reservoir A; the Cotton Valley Formation, Reservoir A; the Lower Hosston Formation, Reservoir B; the Cotton Valley Formation, Reservoir B; and the Haynesville Zone, Reservoir B, in the Belle Bower Field, DeSoto Parish, Louisiana:

1. To dissolve one drilling and production unit established for the Lower Hosston Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, pursuant to Office of Conservation Order No. 312-D, effective December 16, 1977, being the unit designated L HOSS RA SUH, as shown outlined on the plat attached hereto as Exhibit No. 1;
2. To dissolve one drilling and production unit established for the Cotton Valley Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, pursuant to Office of Conservation Order No. 312-E, effective December 16, 1977, being the unit designated CV RA SUH, as shown outlined on the plat attached hereto as Exhibit No. 1;
3. To establish three additional drilling and production units for the exploration for and production of gas and condensate from the Lower Hosston Formation, Reservoir B, in the Belle Bower Field, DeSoto Parish, Louisiana, to be designated L HOSS RB SUC, L HOSS RB SUD, and L HOSS RB SUE, as shown outlined on the plat attached hereto as Exhibit No. 2;

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4. To establish three drilling and production units for the exploration for and production of gas and condensate from the Cotton Valley Formation, Reservoir B, in the Belle Bower Field, DeSoto Parish, Louisiana, to be designated CV RB SUC, CV RB SUD and CV RB SUE, as shown outlined on the plat attached hereto as Exhibit No. 3;
5. To establish three drilling and production units for the exploration for and production of gas and condensate from the Haynesville Formation, Reservoir B, in the Belle Bower Field, DeSoto Parish, Louisiana, to be designated HA RB SUA, HA RB SUB and HA RB SUC, as shown outlined on the plat attached hereto as Exhibit No. 3;
6. To force pool and integrate all of the separately owned tracts, mineral leases and other property interests located within the proposed units for the Lower Hosston Formation, Reservoir B, the Cotton Valley Formation, Reservoir B, and the Haynesville Zone, reservoir B, in accordance with Section 10, Title 30, of the Louisiana Revised Statutes of 1950, with each tract sharing in unit production on a surface acreage basis of participation;
7. To provide for the downhole or wellbore combination of hydrocarbons from the Upper Hosston Formation, Reservoir A, the Lower Hosston Formation, Reservoir B, the Cotton Valley Formation, Reservoir B, and the Haynesville Zone, Reservoir B, with respect to the units designated: (a) U HOSS RA SUL, L HOSS RB SUC, CV RB SUC and HA RB SUA; (b) U HOSS RA SUM, L HOSS RB SUD, CV RB SUD and HA RB SUB; and (c) U HOSS RA SUN, L HOSS RB SUE, CV RB SUE and HA RB SUC, to the extent the configuration and ownership within said units is the same;
8. To designate unit wells and unit operators, as appropriate;
9. To extend to the proposed units the field rules established for the Lower Hosston Formation, Reservoir B, and the Cotton Valley Formation, Reservoir B, by existing orders, except to the extent inconsistent herewith;
10. To establish field rules for the Haynesville Zone, Reservoir B, in the Belle Bower Field, to provide that wells be located no closer than 330 feet from any unit line and that there be not less than 660 feet between wells drilling to, completed in, or for which a permit has been issued to said zone;
11. To provide that with respect to future horizontal wells drilled to the Haynesville Zone, Reservoir B, in the proposed units, where the horizontal portion of the well is cased and cemented back above the top of the Haynesville Zone, Reservoir B, the distance to any unit boundary will be calculated based on the distance to the nearest perforations in the well, and not based on the penetration point or terminus
12. To consider and cover such other matters as the Commissioner of Conservation may deem appropriate and necessary under the circumstances.

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The Upper Hosston Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, was defined in Office of Conservation Order No. 312-C, effective December 16, 1977.

The Lower Hosston Formation in the Belle Bower Field, DeSoto Parish, Louisiana, was defined in Office of Conservation Order No. 312-D, effective December 16, 1977.

The Cotton Valley Formation, Reservoir B, in the Belle Bower Field, DeSoto Parish, Louisiana, was defined in Office of Conservation Order No. 312-E-1, effective January 29, 2008.

The Haynesville Formation in the Belle Bower Field, DeSoto Parish, Louisiana, is to be defined as the stratigraphic equivalent of that gas and condensate producing interval occurring between the depths of 9,800 feet and 11,256 feet (electric log measurements) in the Comstock Oil & Gas, -La., LLC - Caraway Estate No. 2 Well located in Section 20, Township 12 North, Range 16 West, DeSoto Parish, Louisiana.

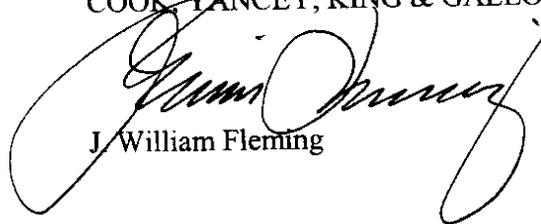
Any pertinent data relating to this matter can be obtained, at the cost of the requesting party, from Mr. Craig Barclay, 522 Dumbarton, Shreveport, Louisiana 71106, telephone number (318) 869-2223.

A Pre-Application Notice dated August 14, 2008, was circulated in connection with this matter. There was no request for a conference; accordingly, no conference was held.

The attached list includes the names of all Interested Owners, Represented Parties and Interested Parties known to Applicant after a diligent search. A copy of this application, with plats attached, is being sent to each such party. Pursuant to Office of Conservation regulations, the list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Shreveport District of the Office of Conservation; however, the list of parties will be provided to any person requesting a copy of it. Also enclosed with the copy of this letter being sent to the Commissioner of Conservation is a check for the application fee.

Yours very truly,

COOK, YANCEY, KING & GALLOWAY



J. William Fleming

jwf:s

Enclosures

cc: James C. Broussard, District Manager
Interested Owners, Represented
Parties and Interested Parties

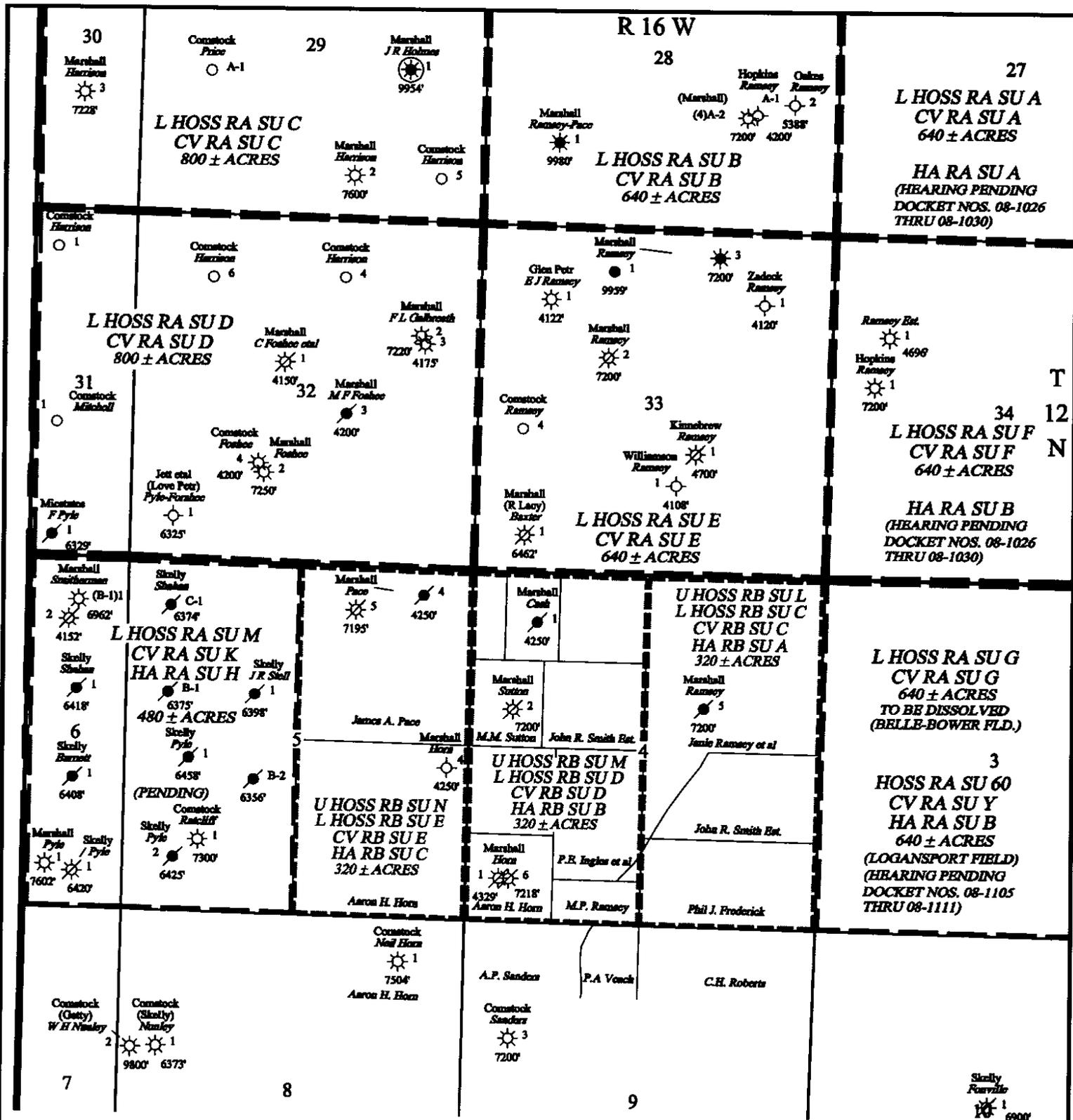


EXHIBIT NO. 1

DOCKET NO. 07-

WILL-DRILL PRODUCTION COMPANY, INC.
SHREVEPORT, LOUISIANA

BELLE BOWER FIELD
DE SOTO PARISH, LOUISIANA

PROPOSED LOWER HOSSON RESERVOIR B SAND UNITS
COTTON VALLEY RESERVOIR B SAND UNITS AND HAYNESVILLE RESERVOIR B SAND UNITS



:EXISTING UNIT WELLS



:EXISTING ALTERNATE UNIT WELLS



:EXISTING SUBSTITUTE UNIT WELL

--- :PROPOSED BELLE BOWER SAND UNITS

--- :EXISTING BELLE BOWER SAND UNITS



GRAPHIC SCALE

NOTE: SHALLOW WELLS NOT SHOWN.

GEOL: CRAIG BARCLAY

Blumberg No. 3208

EXHIBIT

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