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January 4, 2008

COMMISSIONER OF CONSERVATION
HONORABLE JAMES H. WELCH
P. O. BOX 94275
BATON ROUGE LA 70804

**RE: MARG HOWEI SAND, RESERVOIR B
LELEUX FIELD
VERMILION PARISH, LA**

Dear Commissioner Welch,

Application is hereby made on behalf of Frith/Simon/Broussard/Meaux 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 Marg Howei Sand, Reservoir B, in the Leleux Field, Vermilion Parish, Louisiana.

1. To establish rules and regulations and to dissolve the single drilling and production unit for Marg Howei Sand, Reservoir B, by Order No. 341-0-1, effective July 11, 2006, and simultaneously therewith, to create a single drilling and production unit for the exploration for and production of gas and condensate from the Marg Howei Sand, Reservoir B, in the Leleux Field, Vermilion Parish, Louisiana, said unit to be designated Marg H 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 designate XTO Energy Inc. as operator and the Girouard No. 1 Well as the unit well for the unit so created.
4. To provide that any wells drilled to the Marg Howei Sand, Reservoir B shall be located in accordance with the spacing provisions of Statewide Order No. 29-E.
5. To provide that the Commissioner may reclassify the reservoirs by Supplemental Orders without the necessity of a public hearing should such reclassification be warranted, based on evidence furnished by the Commissioner.

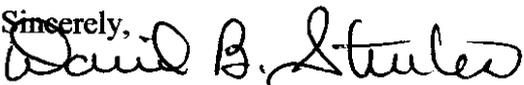
6. To discuss any other matters that may be pertinent to this application.

The Marg Howei SD, Reservoir B, in the Leleux Field, is hereby defined as per order 341-0-1 as being that gas and condensate bearing sand encountered between the depths of 16,040' and 16,235' (electrical log measurements) in the Kern County Land Company – Joseph Herpin Unit No. 1 Well, located in Section 35, Township 11 South, Range 1 East, and is defined as being that sand encountered between the depths of 15,588' and 15,800' (electrical log measurements) in the Pan Am Petroleum Corp – Ursule A. Simon No. 1 Well, located in Section 1, Township 12 South, Range 1 East, Vermilion Parish, Louisiana, and is hereby further defined as being that gas and condensate bearing sand encountered between the depths of 16,063' and 16,256' (electrical log measurements) in the XTO Energy Inc. Girouard No. 1 Well located in Section 36, Township 11 South, Range 1 East, Vermilion Parish, Louisiana.

In compliance with the Rules of Procedure, a pre-application conference was held in Lafayette on January 3, 2008. The applicant explained the basis for his plan. Mr. Bryon Grooves, representing Phyllis Vincent et al, proposed to leave the unit as adopted. Mr. Jim Hardwick, representing Simon et al, presented a counter plan of 295 acres. Mr. Remy Williams, representing Girouard et al, presented a counter plan of 131 acres. Mr. David Comeaux, representing XTO Energy Inc., proposed to leave the unit as adopted. Opposition is expected at the hearing.

All pertinent data relating to the subject application can be obtained **AT THE COST OF THE REQUESTING PARTY**, from David Sturlese, P. O. Box 51405, Lafayette, LA 70505, (337) 232-1700.

There are attached hereto and made a part hereof, plats outlining the proposed unit. Pursuant to the Revised Rules of Procedure, a list of the names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom this application is being sent 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 provided to any party requesting a copy. A diligent effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties as required by the Revised Rules of Procedure. Also enclosed is our check made payable to the Office of Conservation, representing the required hearing application fee.

Sincerely,

DAVID B. STURLESE

Enclosures

ss

cc: Mr. Richard Hudson, Department of Conservation
825 Kaliste Saloom Rd., Brandiwine III Suite 220, Lafayette, LA 70508
Interested Parties, Interested Owners and Represented Parties

R 1 E

R 2 E

Kern
L.E. Breaux
16210'
Agatha Landry

Thomas Herpin

26

David W. Trahan, et al

25

Phyllis Vincent, et al

30

Evelyn Simon, et al

Frances B. Girouard, et al

T
11
Denbury G. Vincent
16410' MD
16376' VD

Denbury G. Vincent
1 (ST1)
14400' MD
14288' VD

Great River F. John
1
16410'

S
Janell F. Landry, et al

A. Girouard
1 (ST2)
14983' MD
14344' MD

MARG H RB SUA
GIROUARD, ET AL NO. 1
± 287 ACRES

John F. Vincent, et al

M. Herpin, et al

35

Phyllis Vincent, et al
John Francis Vincent, et al

36

31

McCarthy Joint Venture

1 ST1
12745' MD
15948' MD

Phyllis Vincent, et al
John Francis Vincent, et al

Donald Simon, et al

Marian Simon Turimage

Norma S. Vincent, et al

Elizabeth Simon Colillon, et al

Geographic

Francis Broussard
Girouard, et al

Dominion Girouard, et al

Greg Girouard

Holy Rosary Catholic Church

John F. Vincent

Geographic

16380' MD
16199' VD

Florence Mouton Broussard

Rustum Girouard

T
S
12²
Roy J. Simon
Elaine Simon

Thomas Simon

Mid Pt.

Perm. Barrier

Sandra Gay Post

Lena Abshire

6

Pan Am
Urusle A. Simon
1
19511'

Clint Frith

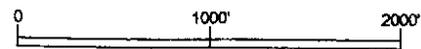
Lorenzo Broussard
1

EXHIBIT NO.
DOCKET NO. DATE:

FRITH/SIMON/BOUSSARD/MEAUX

LELEUX FIELD
VERMILION PARISH, LOUISIANA

PROPOSED UNIT
MARG HOWEI SAND



DAVID STURLESE
CONSULTING GEOLOGIST - LAFAYETTE, LOUISIANA