

# LISKOW & LEWIS

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March 19, 2008

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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: Upper Wilcox Zone, Reservoir A  
Lower Wilcox Zone, Reservoir A  
South Bearhead Creek Field  
Beauregard Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **SWIFT ENERGY OPERATING, LLC** for the calling of public hearings after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters:

1. To dissolve the SBC U WX RA SU, in the South Bearhead Creek Field, Beauregard Parish, Louisiana, established by Office of Conservation Order No. 439-A-3, effective June 12, 1990, and simultaneously therewith, to create a revised reservoirwide unit for the Upper Wilcox Zone, Reservoir A, in South Bearhead Creek Field, Beauregard Parish, Louisiana, said unit designated SBC U WX RA SU.
2. To dissolve the SBC L WX RA SU, in the South Bearhead Creek Field, Beauregard Parish, Louisiana, established by Office of Conservation Order No. 439-B-5, effective September 19, 2006, and simultaneously therewith, to create a revised reservoirwide unit for the Lower Wilcox Zone, Reservoir A, in South Bearhead Creek Field, Beauregard Parish, Louisiana, said unit designated SBC L WX RA SU.
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed revised reservoirwide units, with each separate tract sharing in unit production on a surface acre basis of participation.
4. To confirm and continue in effect Swift Energy Operating, LLC as operator of each of the proposed revised reservoirwide units.
5. Except to the extent contrary herewith, to extend to each of the proposed revised reservoirwide units all pertinent provisions of the 439-A and 439-B Series of Office of Conservation Orders, respectively, and all applicable Statewide Orders.
6. To consider such other matters as may be pertinent.

March 19, 2008

The Upper Wilcox Zone, Reservoir A, in the South Bearhead Creek Field, Beauregard Parish, Louisiana, was previously defined in Office of Conservation Order No. 439-A-3, effective June 12, 1990.

The Lower Wilcox Zone, Reservoir A, in the South Bearhead Creek Field, Beauregard Parish, Louisiana was previously defined by Order 439-B-5, effective September 19, 2006, and is hereby redefined as being that oil and gas bearing zone having a top of 12,470 feet (electrical log measurement) in the Swift Energy Operating, LLC - Krause and Managan Lumber Co. No. 1 Well, located in Section 32, Township 6 South, Range 11 West, Beauregard Parish, Louisiana and a base of 15,084 feet (electrical log measurement) in the Swift Energy Operating, LLC (formerly Getty Oil) – A. H. Irby No. 1 Well, located in Section 29, Township 6 South, Range 11 West, Beauregard Parish, Louisiana.

Any pertinent data not available from the Office of Conservation, including well logs, may be obtained **AT THE COST OF THE REQUESTING PARTY** from W. H. Robbins & Associates, L.L.C., 302 LaRue France, Lafayette, Louisiana 70508, Telephone Number (337) 232-5004.

Pursuant to the Rules of Procedure, a pre-application conference was held on March 5, 2008, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the applicant's proposals. Questions were asked and answered. Three counterplans were shown with respect to the Upper Wilcox Zone. No counterplans were shown relating to the Lower Wilcox Zone; however, some opposition to removing acreage from the original unit was expressed. The conference was adjourned without a resolution of differences. In response to the opposition expressed, the applicant has slightly amended its Lower Wilcox proposal to reduce the amount of acreage being eliminated. The Upper Wilcox proposal has been amended so as to leave the original north boundary of the unit intact so that no acreage within the existing unit is eliminated from the proposed revised unit. We are hopeful that these revisions will result in an uncontested hearing; however, that is not certain.

Attached hereto and made a part hereof are plats outlining the applicant's proposals, the conference attendance list and the 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, the 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 \$1,510.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Sincerely,

LISKOW & LEWIS

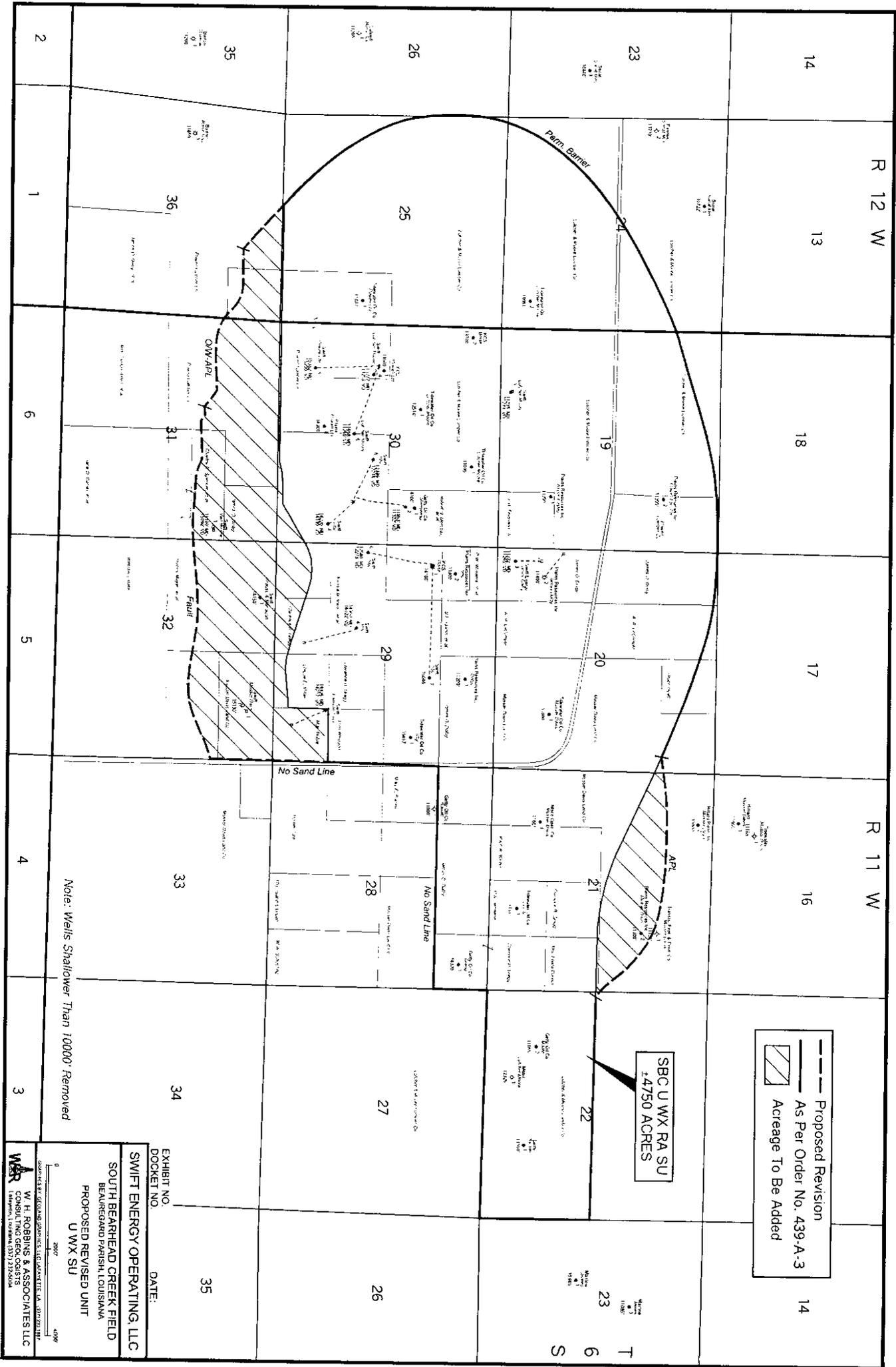


Richard W. Revels, Jr.

RWRjr:dbf

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

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82360.0059



 Proposed Revision  
 As Per Order No. 439-A-3  
 Acreage To Be Added

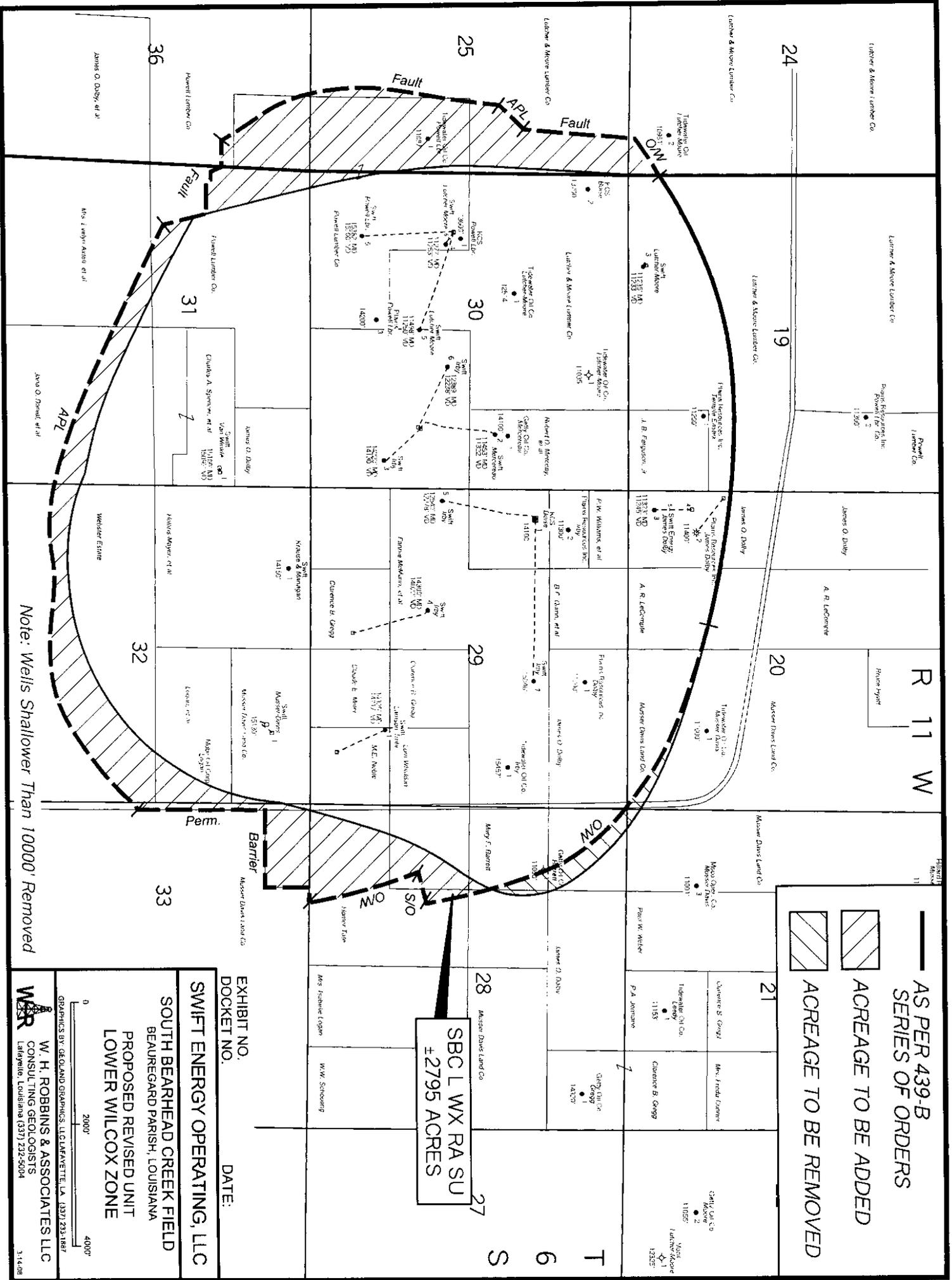
**SBC U WX RA SU**  
**14750 ACRES**

Note: Wells Shallower Than 10000' Removed

EXHIBIT NO. DATE:  
 DOCKET NO.  
**SWIFT ENERGY OPERATING, LLC**  
**SOUTH BEARHEAD CREEK FIELD**  
**BEAUREGARD PARISH, LOUISIANA**  
**PROPOSED REVISED UNIT**  
**U WX SU**  
 0 2000' 4000'  
**W.H. ROBBINS & ASSOCIATES, LLC**  
 CONSULTING ENGINEERS  
 1800 Poydras Street, Suite 2000  
 New Orleans, Louisiana 70112-3204  
 Telephone: (504) 271-2200

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AS PER 439-B  
 SERIES OF ORDERS  
 ACREAGE TO BE ADDED  
 ACREAGE TO BE REMOVED



Note: Wells Shallower Than 10000' Removed

EXHIBIT NO. DATE:  
 DOCKET NO.

**SWIFT ENERGY OPERATING, LLC**  
 SOUTH BEARHEAD CREEK FIELD  
 BEAUREGARD PARISH, LOUISIANA  
 PROPOSED REVISED UNIT  
 LOWER WILCOX ZONE

GRAPHICS BY: GEORAND GRAPHICS, LLC LAFALETTE, LA (337) 233-1881

**W. H. ROBBINS & ASSOCIATES LLC**  
 CONSULTING GEOLOGISTS  
 Lafayette, Louisiana (337) 232-5004