LISKOW&LEWIS
A Professional Law Corporation

822 Harding Street
Post Office Box 52008
Lafayette, LA 70505
(337) 232-7424 Main
(337) 267-2399 Fax

www.Liskow.com

One Shell Square
701 Poydras Street, Suite 5000
New Orleans, LA 70139
(504) 581-7979 Main
(504) 556-4108 Fax

First City Tower
1001 Fannin, Suite 1800
Houston, TX 77002
(713) 651-2900 Main
(713) 651-2908 Fax

April 1, 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: Jeter SUK
PET SUI
Logansport Field
Desoto Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BP AMERICA PRODUCTION COMPANY** for the calling of public hearings, after ten (10) days legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters:

1. To permit the applicant to recomplete, designate and utilize its Gannon-Frost No. 2 Well as substitute unit well for the JETER SUK, said well located as shown on the plat attached hereto, in accordance with the spacing provisions of Office of Conservation Order No. 28-C, effective February 10, 1942.

2. To permit the applicant to recomplete, designate and utilize its Gannon-Frost No. 1 Well as substitute unit well for the PET SUI, said well located in exception to the spacing provisions of Office of Conservation Order No. 28-E, effective October 3, 1944.

3. To find that each of the proposed substitute unit wells are necessary to efficiently and economically drain a portion of the reservoir covered by the respective unit which cannot be so drained by any existing well within such unit.

4. Except to the extent contrary herewith, to continue in full force and effect the provisions of the 28-C and 28-E Series of Office of Conservation Orders, the units created thereby, and applicable Statewide Orders, respectively.

5. To consider such other matters as may be pertinent.

The Jeter Zone in Logansport Field, DeSoto Parish, Louisiana, was previously defined in Office of Conservation Order No. 28-C, effective February 10, 1942.

The Pettit Zone, Reservoir A, in the Logansport Field, DeSoto Parish, Louisiana, was previously defined in Office of Conservation Order No. 28-E, effective October 3, 1944.

The Gannon-Frost No. 1 Well and the Gannon-Frost No. 2 Wells are currently existing unit wells for the JETER SUK and the PET SUI, respectively. The applicant is requesting permission to deepen and complete the Gannon-Frost No. 1 Well in the Petit Zone, and to recomplete the Gannon-Frost No. 2 Well uphole in the Jeter Zone. Note that the JETER SUK and the PET SUI are identical in size and shape.

Attached hereto and made a part hereof are plats outlining the applicant's proposals 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 sent. 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 Shreveport District of the Office of Conservation; however, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

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

Sincerely,

LISKOW & LEWIS

Richard W. Revels, Jr.

Richard W. Revels, Jr.

RWRjr:dbf
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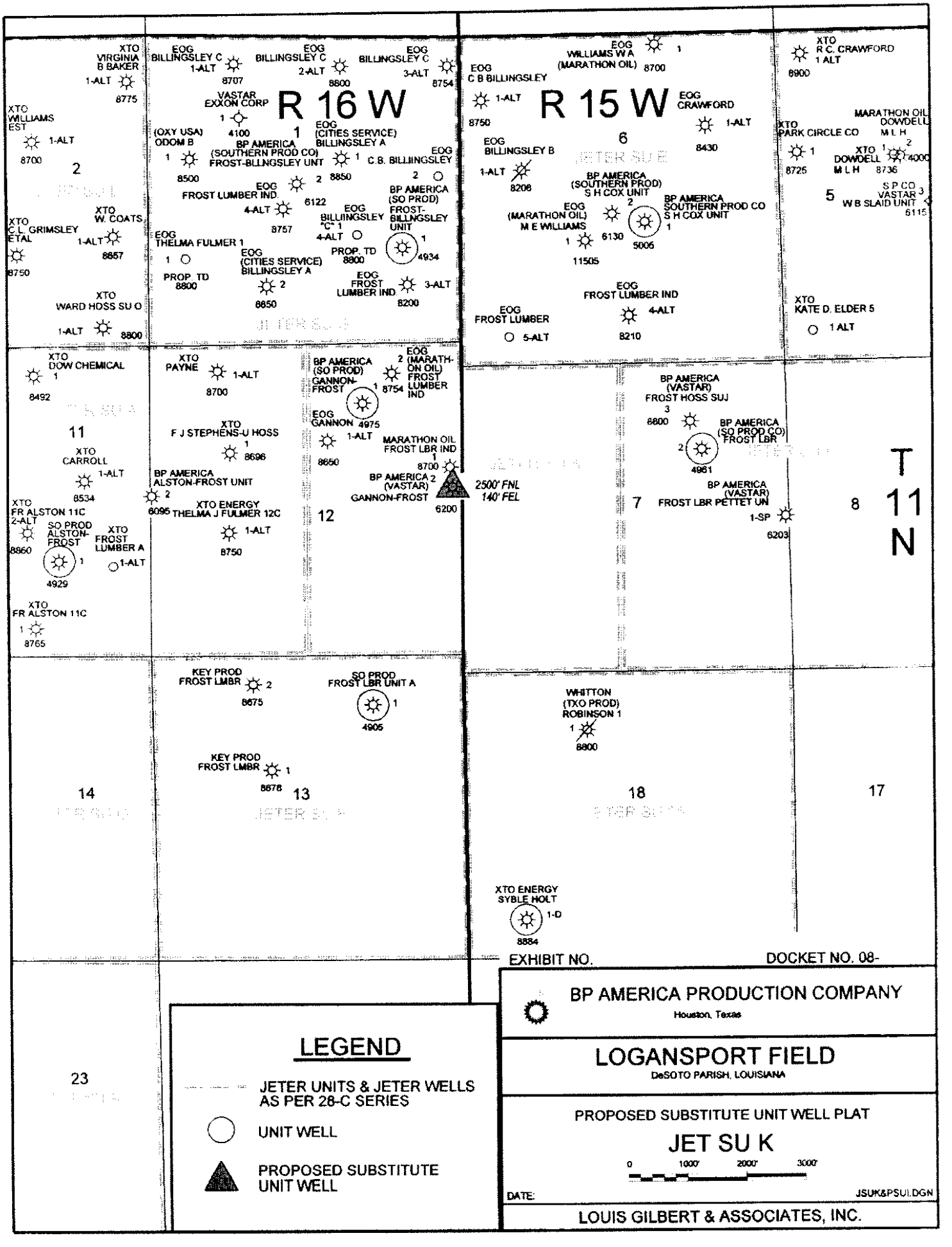
10455.0253

cc: Mr. James Broussard, Shreveport District Office of Conservation
Interested Owners, Represented Parties and Interested Parties


R 16 W
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XTO VIRGINIA B BAKER 1-ALT 8775
XTO WILLIAMS EST 1-ALT 8700
XTO W. COATS 1-ALT 8657
XTO C.L. GRIMSLEY ETAL 8750
XTO WARD HOSS SU O 1-ALT 8800
EOG BILLINGSLEY C 1-ALT 8707
EOG BILLINGSLEY C 2-ALT 8800
EOG BILLINGSLEY C 3-ALT 8754
VASTAR EXXON CORP 1 4100
(OXY USA) ODOM B 1 8500
BP AMERICA (SOUTHERN PROD CO) FROST-BILLINGSLEY UNT 1 8850
EOG (CITIES SERVICE) BILLINGSLEY A
EOG C.B. BILLINGSLEY 2
EOG FROST LUMBER IND. 4-ALT 8757
EOG BILLINGSLEY "C" 1 4-ALT
BP AMERICA (SO PROD) FROST-BILLINGSLEY UNIT 1 4934
EOG THELMA FULMER 1 1
PROP. TD 8800
EOG (CITIES SERVICE) BILLINGSLEY A 2 8850
EOG FROST LUMBER IND 3-ALT 8200
EOG WILLIAMS W A (MARATHON OIL) 1 8700
EOG C B BILLINGSLEY 1-ALT 8750
EOG CRAWFORD 1-ALT 8430
EOG BILLINGSLEY B 1-ALT 8208
BP AMERICA (SOUTHERN PROD) S H COX UNIT 2
BP AMERICA SOUTHERN PROD CO S H COX UNIT 1 5006
EOG (MARATHON OIL) M E WILLIAMS 1 6130
11505
EOG FROST LUMBER IND 4-ALT 8210
EOG FROST LUMBER 5-ALT
XTO R.C. CRAWFORD 1 ALT 8900
MARATHON OIL DOWDELL M L H 2 4000
XTO PARK CIRCLE CO 1 8725
XTO DOWDELL M L H 1 8736
S P CO VASTAR W B SLAID UNIT 3 6115
XTO KATE D. ELDER 5 1 ALT
XTO DOW CHEMICAL 1 8492
XTO PAYNE 1-ALT 8700
XTO F J STEPHENS-U HOSS 1 8696
XTO CARROLL 1-ALT 8534
BP AMERICA ALSTON-FROST UNIT 2 6095
XTO ENERGY THELMA J FULMER 12C 1-ALT 8750
XTO FR ALSTON 11C 2-ALT 8860
SO PROD ALSTON-FROST 1 4929
XTO FROST LUMBER A 1-ALT
XTO FR ALSTON 11C 1 8765
BP AMERICA (SO PROD) GANNON-FROST 1 8754
EOG (MARATHON OIL) FROST LUMBER IND 2
EOG GANNON 1-ALT 8650
4975
MARATHON OIL FROST LBR IND 1 8700
BP AMERICA 2 (VASTAR) GANNON-FROST 6200
2500' FNL 140' FEL
BP AMERICA (VASTAR) FROST HOSS SUJ 3 8800
BP AMERICA (SO PROD CO) FROST LBR 2 4981
BP AMERICA (VASTAR) FROST LBR PETTET UN 1-SP 6203
KEY PROD FROST LMBR 2 8675
SO PROD FROST LBR UNIT A 1 4905
KEY PROD FROST LMBR 1 8678
WHITTON (TXO PROD) ROBINSON 1 1 8800
XTO ENERGY SYBLE HOLT 1-D 8884
LEGEND
JETER UNITS & JETER WELLS AS PER 28-C SERIES
UNIT WELL
PROPOSED SUBSTITUTE UNIT WELL
EXHIBIT NO.
DOCKET NO. 08-
BP AMERICA PRODUCTION COMPANY
Houston, Texas
LOGANSPORT FIELD
DeSOTO PARISH, LOUISIANA
PROPOSED SUBSTITUTE UNIT WELL PLAT
JET SU K
0 1000' 2000' 3000'
DATE:
JSUK&PSUL.DGN
LOUIS GILBERT & ASSOCIATES, INC.

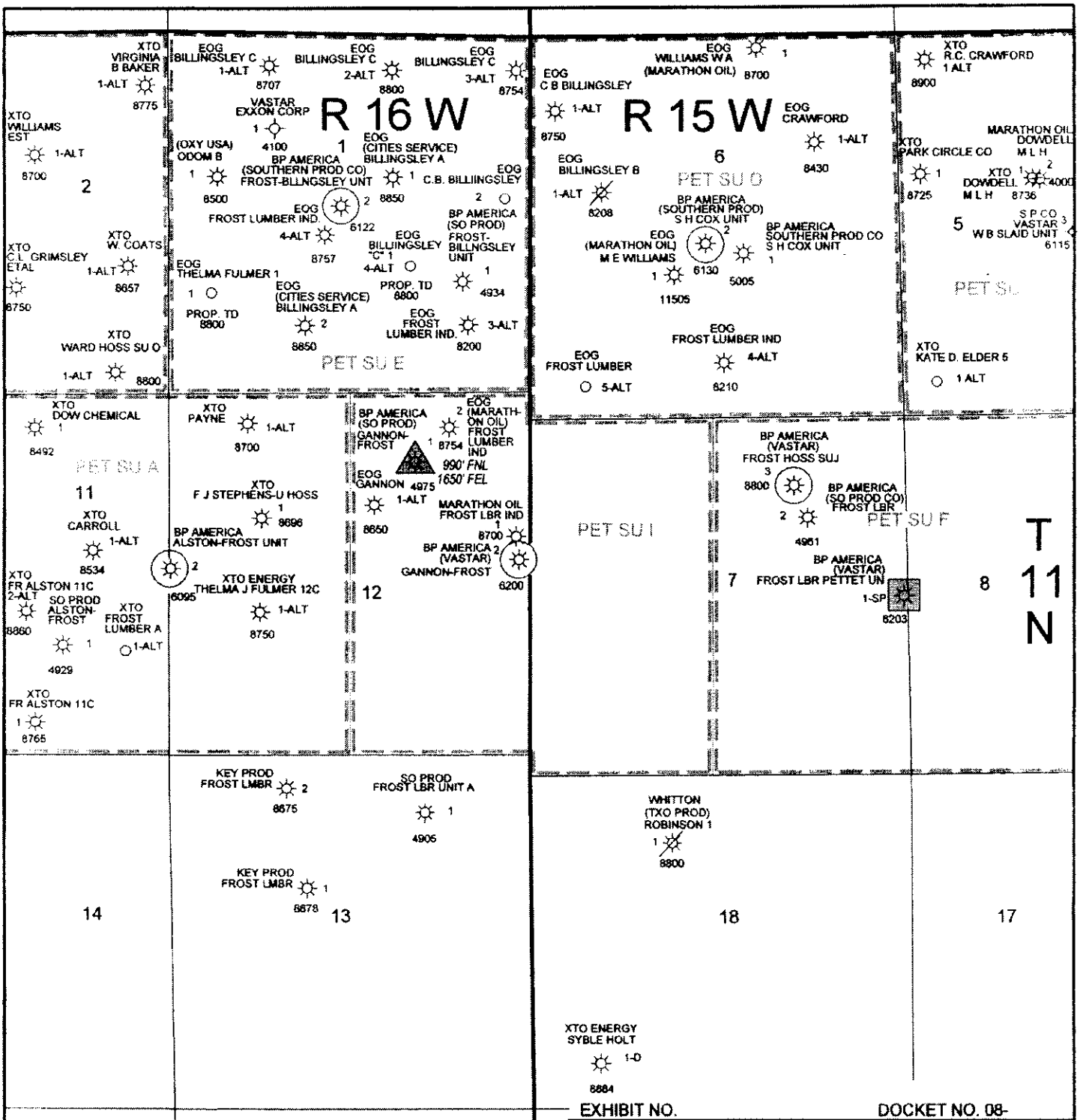

EXHIBIT NO. DOCKET NO. 08-

BP AMERICA PRODUCTION COMPANY
Houston, Texas

LOGANSPORT FIELD
DeSOTO PARISH, LOUISIANA

PROPOSED SUBSTITUTE UNIT WELL PLAT

PET SU I

0 1000' 2000' 3000'

DATE: JSUK&PSUI.DGN

LOUIS GILBERT & ASSOCIATES, INC.

LEGEND

- PETTIT UNITS & PETTIT WELLS AS PER 28-E SERIES
- UNIT WELL
- PROPOSED SUBSTITUTE UNIT WELL