

# BLANCHARD WALKER

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BLANCHARD, WALKER, O'QUIN & ROBERTS  
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May 9, 2008

**Mailing Address:**  
P.O. Drawer 1126  
Shreveport, LA 71163-1126

Honorable James H. Welsh  
Commissioner of Conservation  
State of Louisiana  
Post Office Box 94275  
Baton Rouge, Louisiana 70804-9275

**WM. TIMOTHY ALLEN, III**  
**Direct:** 318.934.0217  
**Email:** tallen@bwor.com

RE: HEARING APPLICATION  
Alternate Unit Wells  
Gray Sand, Reservoir D  
GRAY RD SUD  
Cotton Valley Field  
Webster Parish, Louisiana  
Our File No. 450323.30

Dear Sir:

On behalf of WILL DRILL PRODUCTION CO., INC., application is hereby made for a public hearing to receive evidence concerning the issuance of an order pertaining to the following matters relating to the Gray Sand, Reservoir D, in the Cotton Valley Field, Webster Parish, Louisiana:

1. To permit the Applicant to drill, designate and utilize four (4) alternate unit wells for GRAY RD SUD, at the locations shown on the plat attached hereto.
2. To explicitly find that the proposed alternate unit wells are in the interest of conservation and are necessary to drain a portion of the Gray Sand, Reservoir D, in the Cotton Valley Field, underlying GRAY RD SUD, which cannot be efficiently and economically drained by any existing well in such unit.
3. To provide that the unit allowable for GRAY RD SUD may be produced from either the unit well, the alternate unit wells, or any combination thereof, at the operator's discretion.
4. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Gray Sand, Reservoir D, in the Cotton Valley Field, Webster Parish, Louisiana, was fully defined in Office of Conservation Order No. 10-EE-4, effective October 26, 1979.

The Rules of Procedure of the Commissioner of Conservation pertaining to the Pre-Application Notice requirements, are not applicable to the hearing requested herein, which requires legal notice of only ten (10) days.

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Pertinent data concerning the intended application will be made available for inspection at the offices of the undersigned. Any person wishing to inspect such data should call the undersigned at (318) 221-6858 during normal business hours or write the undersigned at the above address in order to arrange a date and time for such inspection. A copy of any such pertinent data can be obtained at the expense of the requesting party.

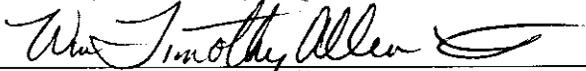
A list of the names and addresses of all Interested Owners, Represented Parties and Interested Parties (as defined in the Rules of Procedure) is attached hereto, and a copy of this notice, with the annexed plat, is being sent to each of such persons. A reasonable effort has been made to determine that the enclosed list includes all of the persons to whom this notice must be sent under the Rules of Procedure.

A check in the amount of \$755.00 made payable to the Commissioner of Conservation is enclosed herewith as the statutory fee for holding the requested hearing.

This application is being filed in duplicate, and a copy hereof is being sent to Mr. James C. Broussard, Shreveport District Manager of the Office of Conservation, and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

Very truly yours,

BLANCHARD, WALKER, O'QUIN & ROBERTS

By:   
Wm. Timothy Allen III  
Attorneys for Will-Drill Production Co., Inc.

WTAIII:kmw  
Enclosures

- cc: Mr. James C. Broussard, District Manager  
Office of Conservation, Shreveport, La. (w/enclosures)
- cc: Interested Owners, Represented Parties  
and Interested Parties (w/copy of plat only)

