

IRONCROSS, INC.

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05 August 2009

Honorable James H. Welsh
Commissioner of Conservation
Office of Conservation
P.O. Box 94275
Baton Rouge, Louisiana 70804-4275

Re: APPLICATION FOR PUBLIC HEARING
MUNOCO COMPANY (OPR CODE 4347)
ALTERNATE UNIT WELL AT EXCEPTION
TO SPACING PROVISIONS
E-2 SUQ ; KING NO. 1 (PROPOSED)
SEC 23 T10N R6E RAWSON CREEK FIELD
CATAHOULA PARISH, LOUISIANA

Application is hereby made on behalf of MUNOCO COMPANY (Applicant) to the Commissioner of Conservation for calling of public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters concerning E-2 Sand, SUQ of Rawson Creek Field, Catahoula Parish, Louisiana:

- 1) To grant an exception to the spacing provisions of Office of Conservation Order No. 851, so as to permit the Applicant to drill, complete, and designate their proposed wellbore - Munoco Company - King No. 1 Well as an alternate unit well for production of oil from the E-2 Sand, within the unit designated E-2 SUQ, Rawson Creek Field, Catahoula Parish, Louisiana; such well location being shown on the attached unit plat and made a part hereof.
- 2) To grant status of the proposed wellbore - Munoco Company - King No. 1 Well as an Alternate Unit Well for E-2 SUQ Tract.
- 3) To determine that the requested completion wellbore will enable a more effective and efficient drainage of a portion of the reservoir which can not otherwise be drained by any other well located therein, absent approval of the exception to spacing provision.
- 4) To designate Munoco Company as the Operator of such Alternate Unit Well.
- 5) To consider any and all other matters as the Commissioner of Conservation may deem pertinent and appropriate concerning this application and request.

Office of Conservation Order No. 851 was promulgated effective 01 February 1970, and established rules, regulations and created drilling and oil production units for the E-2 Sand of the Rawson Creek Field, Catahoula Parish, Louisiana. This order provides that no well shall be drilled within 330 feet of an existing unit boundary, or within 900 feet of any other well which has been permitted for, drilled to, or completed within the E-2 Sand.

The E-2 Sand, in the Rawson Creek Field of Catahoula Parish, Louisiana was defined as being that sand which was found between the depths of 3905 feet and 3920 feet (induction electric log measurement) in the Munoco Company - International Paper Company, et al No. 1 Well, located in the Southeast Quarter of the Northeast Quarter of Section 23, Township 10 North, Range 6 East, Catahoula Parish, Louisiana.

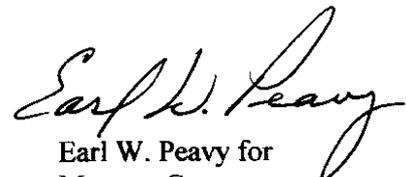
Pertinent data concerning this application is available for inspection at the offices of Earl W. Peavy, 1310 Pine Street Extension, Jena, Louisiana 71342. Any person wishing to inspect such data should call Earl W. Peavy at 318-992-4156 during normal business hours in order to arrange a date and time for such inspection. A copy of such pertinent data, that is otherwise not available from the Office of Conservation, can be obtained at the expense of the requesting party.

The subject matter of this application does not require a pre-application notice nor a pre-hearing conference. Accordingly, no notice has been issued, and it is requested that the hearing be held after the necessary ten (10) day delay following legal advertisement.

Pursuant to the revised Rules of Procedure, Applicant has made a reasonable effort to obtain the names and addresses of all Interested Owners, Interested Parties and Represented Parties to whom this notice of application is being sent. A copy of this letter and the attached plat is being sent to the District Manager of the Monroe District Office of Conservation and to the Interested Owners, Interested Parties and Represented Parties as shown on the attached list.

We are enclosing our check in the amount of \$755.00, made payable to the Office of Conservation, to cover the applicable hearing fee.

Sincerely,


Earl W. Peavy for
Munoco Company

cc: Joseph F. DeVall, Manager-Monroe District Office of Conservation
Interested Owners, Interested Parties and Represented Parties
Ernest Kavanaugh - Munoco Company, El Dorado, Arkansas
Tom Watson - Munoco Company, El Dorado, Arkansas
Encl(3)

