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BLANCHARD, WALKER, O'QUIN & ROBERTS
A PROFESSIONAL LAW CORPORATION

September 4, 2009

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

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

RE: HEARING APPLICATION
Haynesville Zone, Reservoir A
Benson Field
DeSoto and Sabine Parishes, Louisiana
Our File No. 230593.323

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

Dear Sir:

On behalf of COMSTOCK OIL & GAS-LOUISIANA, LLC, 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 Haynesville Zone, Reservoir A, in the Benson Field, DeSoto Parish, Louisiana:

1. To create seven (7) additional drilling and production units (to be designated as HA RA SUFF thru HA RA SULL), as shown on the plat attached hereto, for the exploration for and production of gas and condensate from the Haynesville Zone, Reservoir A, in the Benson Field, DeSoto Parish, Louisiana.
2. To force pool and integrate all separately owned tracts, mineral leases, and other property interests within each of the proposed units, with allocation of production to the tracts within such units to be on the basis of surface acreage.
3. To redefine the Haynesville Zone, Reservoir A, in the Benson Field, as that gas and condensate bearing interval between the depths of 10,037 feet and 11,644 feet (electric log measurements) in the Comstock - BSMC LA 12 HZ No. 1 Well located in Section 12, Township 10 North, Range 15 West, DeSoto Parish, Louisiana, INSOFAR ONLY as to the proposed HA RA SUFF thru HA RA SULL.
4. To provide that, with respect to future horizontal wells drilled to the Haynesville Zone, Reservoir A, in the proposed units, where the horizontal portion of the well is cased and cemented back above the top of the Haynesville Zone, Reservoir A, the distance to any unit boundary and between offset well(s) will be calculated based on the distance to the nearest perforation in the well, and not based on the penetration point or terminus.
5. To designate Comstock Oil & Gas - Louisiana, LLC as unit operator of the proposed HA RA SUFF thru HA RA SULL.
6. To permit the Applicant to drill, designate and utilize unit wells for the proposed units, at the locations shown on the plat attached hereto, as follows:

BSMC LA 2 HZ No. 1 Well for HA RA SUFF;
BSMC LA 1 HZ No. 1 Well for HA RA SUGG;
BSMC LA 6 HZ No. 1 Well for HA RA SUHH;
BSMC LA 5 HZ No. 1 Well for HA RA SUII;
BSMC LA 9 HZ No. 1 Well for HA RA SUJJ; and
BSMC LA 8 HZ No. 1 Well for HA RA SUKK.
7. Except to the extent contrary herewith, to extend the provisions of the 496-L Series of Orders, as amended and supplemented by the 496-L Series of Orders, to the proposed units.

8. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Haynesville Zone, in the Benson Field, DeSoto Parish, Louisiana was initially defined in Office of Conservation Order No. 496-L, effective November 18, 2008, but shall be redefined as set forth above.

Pertinent data regarding this application will be available for inspection at the offices of Blanchard, Walker, O'Quin & Roberts, 15th Floor, Chase Tower, 400 Texas Street, Suite 1400, Shreveport, Louisiana 71101. Any person wishing to inspect such data should call Mr. Wm. Timothy Allen III at (318) 221-6858, during normal business hours, or write Mr. Allen at the above address in order to arrange a time and date for such inspection. Copies of 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 Revised Rules of Procedure) is attached hereto, and a copy of this Application, 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 Revised Rules of Procedure. Pursuant to the Revised Rules of Procedure, such 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.

By Pre-Application Notice dated August 14, 2009, applicant advised the Commissioner of Conservation, the District Manager and all Interested Owners, Represented Parties and Interested Parties of applicant's intention to apply for the hearing which is the subject of this application. Applicant received no request for a conference, and accordingly, no conference will be held.

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, to all Pre-Application Conference Attendees and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

You may have received this Hearing Application even though your property may or may not be included in the proposed units, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed units.

Your receipt of this Hearing Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.

Very truly yours,

BLANCHARD, WALKER, O'QUIN & ROBERTS

By: 
Wm. Timothy Allen III
Attorneys for Comstock Oil & Gas-Louisiana, LLC

WTAlII/kmw

Enclosures

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

