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December 9, 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: Cotton Valley Formation, Reservoir A
Haynesville Zone, Reservoir A
Pleasant Hill Field
DeSoto Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **SWEPI LP** 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 create one (1) additional drilling and production unit for the exploration for and production of gas and condensate from the Cotton Valley Formation, Reservoir A, in the Pleasant Hill Field, DeSoto Parish, Louisiana, said unit to be designated CV RA SUP, as shown on the plat attached hereto and made a part hereof.
2. To create one (1) additional drilling and production unit for the exploration for and production of gas and condensate from the Haynesville Zone, Reservoir A, in the Pleasant Hill Field, DeSoto Parish, Louisiana, said unit to be designated HA RA SUP, all as shown on the plat attached hereto and made a part hereof.
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.
4. To provide that any wells drilled to the Cotton Valley Formation, Reservoir A, in the Pleasant Hill Field, within or outside the units created herein, should be located in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
5. That any future wells drilled to the Haynesville Zone, Reservoir A, within or outside of the units created herein, should be located no closer than 330 feet from any unit line and no closer than 660 feet to any well on a competitive unit completed in, drilling to, or for which a permit has been granted to drill to the Haynesville Zone, Reservoir A; and to provide that with respect to horizontal wells drilled to the Haynesville Zone, Reservoir A, 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

December 9, 2008

boundary will be calculated based on the distance to the nearest perforations in the well, and not based on the penetration point or terminus.

6. To consider such others matters as may be pertinent.

The Cotton Valley Formation, Reservoir A, in the Pleasant Hill Field, DeSoto Parish, Louisiana, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing zone encountered between the depths of 9,870 feet and 11,135 feet (electrical log measurements) in the Phillips Petroleum Company – Martin “B” No. 1 Well, located in Section 32, Township 11 North, Range 10 West, Natchitoches Parish, Louisiana.

The Haynesville Zone, Reservoir A, in the Pleasant Hill Field, DeSoto Parish, Louisiana, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing zone encountered between the depths of 11,135 feet and 13,140 feet (electrical log measurements) in the Phillips Petroleum Company – Martin “B” No. 1 Well, located in Section 32, Township 11 North, Range 10 West, Natchitoches Parish, Louisiana.

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

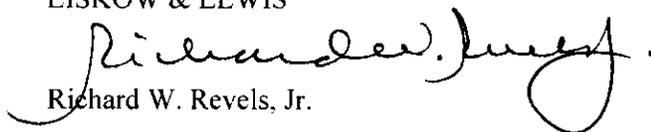
Pursuant to the Rules of Procedure, a pre-application conference was held on December 4, 2008, in Natchitoches, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the units being requested. Questions were asked and answered. No counterplans were presented and the conference was adjourned.

Attached hereto and made a part hereof are plats outlining the applicant’s proposals, the conference attendance list 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 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 Shreveport 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

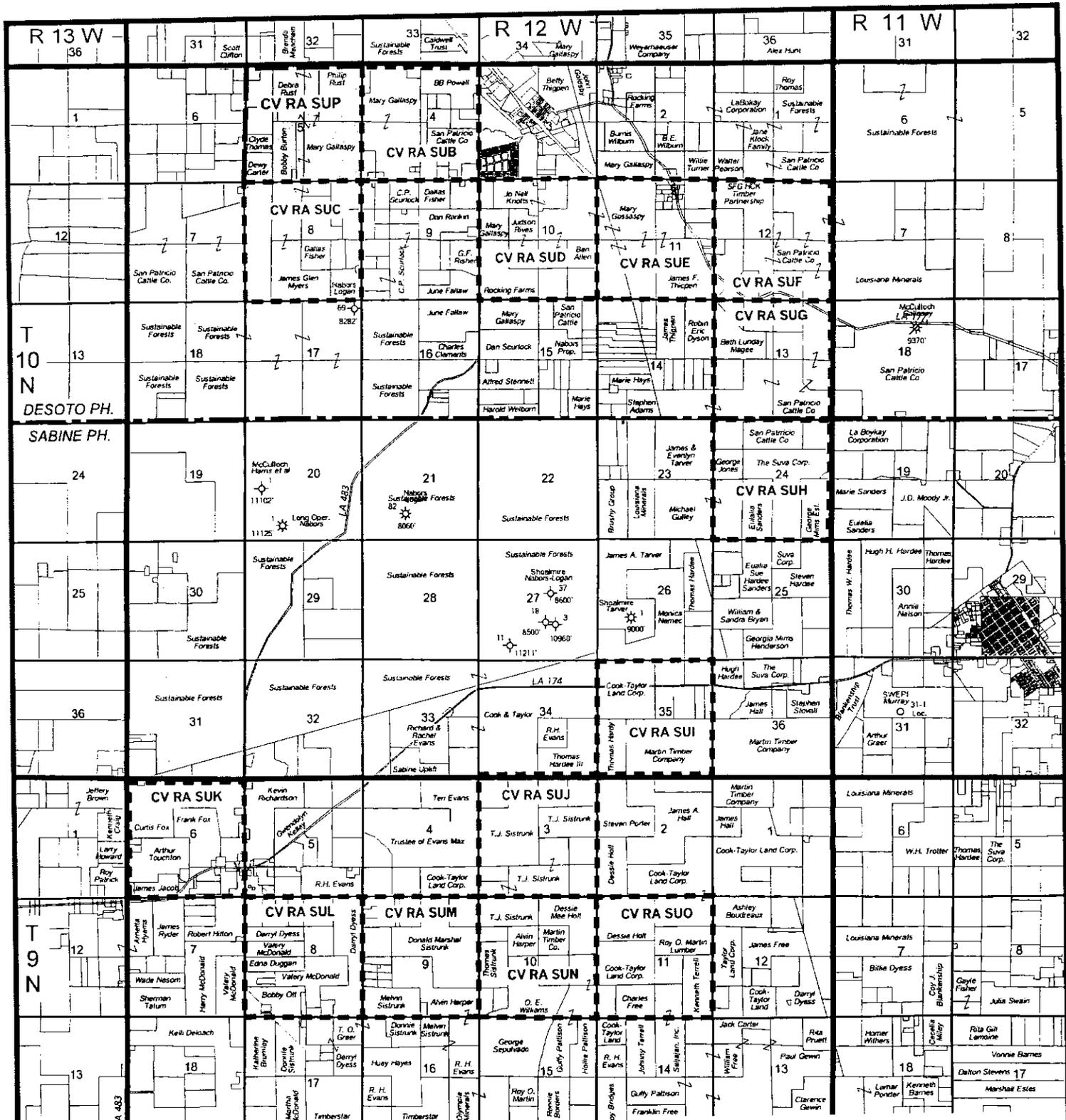


Richard W. Revels, Jr.

RWRjr:dbf
Attachments

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

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78475.0070



- - - PROPOSED UNIT BOUNDARY
 - - - PENDING UNIT BOUNDARY
 NOTE: ALL BOUNDARIES ARE GEOGRAPHIC
 ALL UNITS ± 640 ACRES
 All Wells Shallower Than 8000' Omitted

EXHIBIT NO. _____
 DOCKET NO. _____
 DATE: _____

SWEPI LP
 PLEASANT HILL FIELD
 DESOTO & SABINE PARISHES, LOUISIANA
 PROPOSED UNITS
 COTTON VALLEY FORMATION

0 6000' 12000'

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

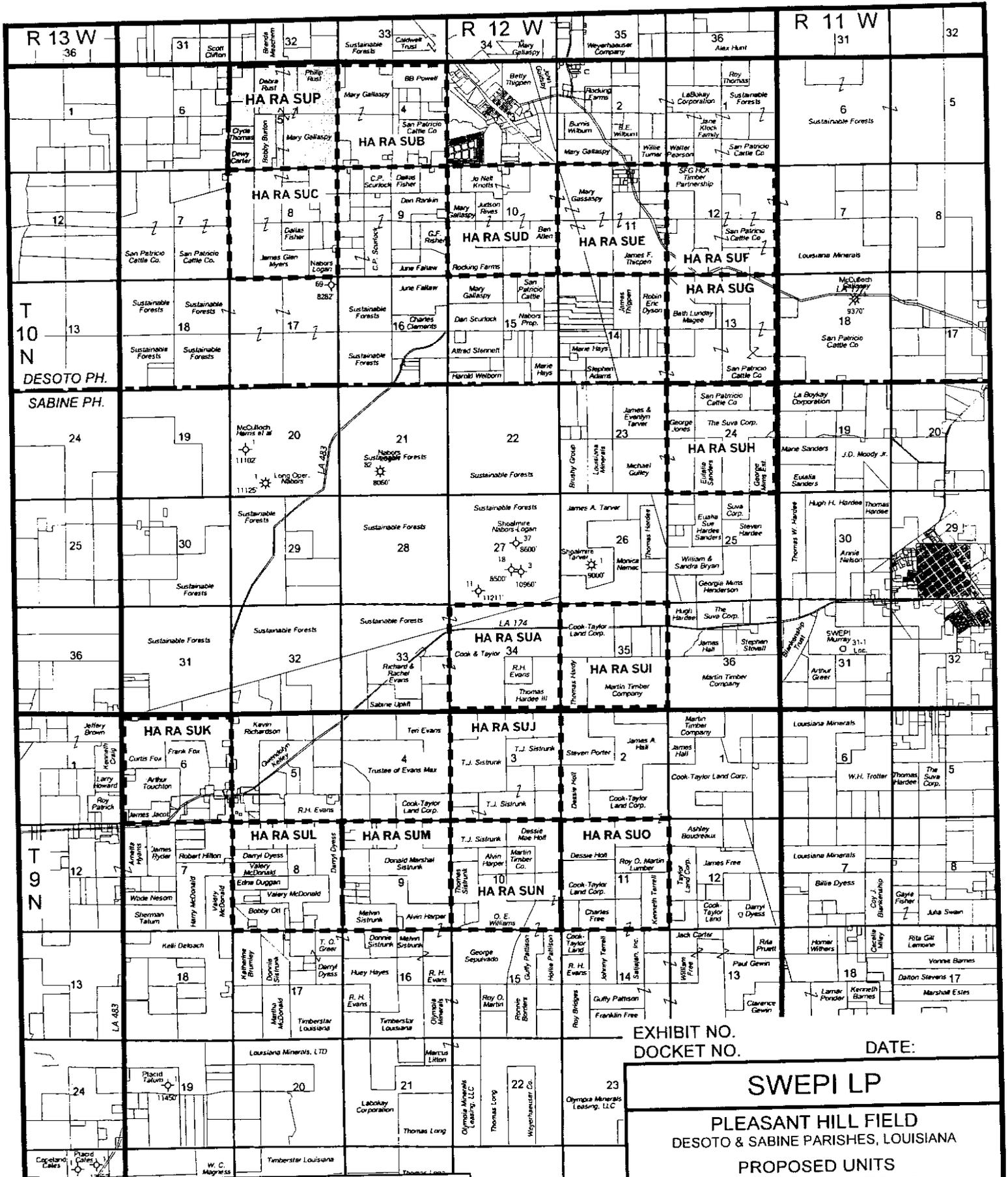


EXHIBIT NO. _____ DATE: _____
 DOCKET NO. _____

SWEPI LP

PLEASANT HILL FIELD
 DESOTO & SABINE PARISHES, LOUISIANA

PROPOSED UNITS
HAYNESVILLE ZONE

0 6000' 12000'

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

— PROPOSED UNIT BOUNDARY
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