

October 23, 2009

Ref: 4181-26489

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

Re: Authority to Downhole Commingle
LOWER TUSCALOOSA SAND, RESERVOIR A SUL
20,800' TUSCALOOSA SAND, RESERVOIR A SUL
21,100' TUSCALOOSA SAND, RESERVOIR A SUL
Judge Digby Field, Pointe Coupee Parish, LA
Order Nos. 1046-D; 1046-A-7; 1046-F;

Dear Mr. Commissioner:

Application is hereby made on behalf of Pennington Oil & Gas Interests, LLC for the calling of a public hearing after ten (10) days legal notice to consider evidence relative to the issuance of an Order pertaining to the following matters relating to the Lower Tuscaloosa Sand, Reservoir A SUL, 20,800' Tuscaloosa Sand, Reservoir A SUL and 21,100' Tuscaloosa Sand, Reservoir A SUL in the Judge Digby Field, Pointe Coupee Parish, Louisiana:

1. To grant permission to applicant to combine downhole production from the Lower Tuscaloosa Sand, Reservoir A SUL, 20,800' Tuscaloosa Sand, Reservoir A SUL and 21,100' Tuscaloosa Sand, Reservoir A SUL, in the wellbore of any existing and future wells located on said units. The interests of the working interest owners and royalty owners in the units are identical.

2. To further define the Lower Tuscaloosa Sand, Reservoir A SUL, created by Office of Conservation Order No. 1046-A-7, effective March 19, 1997; the 20,800' Tuscaloosa Sand, Reservoir A SUL, created by Office of Conservation Order No. 1046-F, effective July 23, 2002 and the 21,100' Tuscaloosa Sand, Reservoir A SUL, created by Office of Conservation Order No. 1046-D, effective June 2, 1998.

3. To confirm Pennington Oil & Gas Interests, LLC as operator of the Lower Tuscaloosa Sand, Reservoir A SUL, 20,800' Tuscaloosa Sand, Reservoir A SUL and 21,100' Tuscaloosa Sand, Reservoir A SUL.

4. To continue in full force and effect the provisions of Office of Conservation Order No. 1046-A-7, effective March 19, 1997; Office of Conservation Order No. 1046-F, effective July 23, 2002 and Office of Conservation Order No. 1046-D, effective June 2, 1998.

5. To consider such other matters as may be pertinent and appropriate as shown by the evidence presented.

The Lower Tuscaloosa Sand, Reservoir A, was previously defined in Office of Conservation Order No. 1046, effective September 6, 1978, as amended and supplemented

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by the 1046-A Series of Orders and is hereby further defined in the L TUSC RA SUL as being that gas and condensate bearing sand encountered between the depths of 20,430 feet and 20,870 feet (electrical log measurements) in the Pennington Oil & Gas Interests, LLC-Bomer Blanks No. 1 Well, located in Section 10, Township 5 South, Range 9 East, Pointe Coupee Parish, Louisiana.

The 20,800' Tuscaloosa Sand, Reservoir A was previously defined in Office of Conservation Order No. 1046-F, effective July 23, 2002 and is hereby further defined in the 20,800' TUSC RA SUL as being that gas and condensate bearing sand encountered between the depths of 20,870 feet and 21,345 feet (electrical log measurements) in the Pennington Oil & Gas Interests, LLC-Bomer Blanks No. 1 Well, located in Section 10, Township 5 South, Range 9 East, Pointe Coupee Parish, Louisiana.

The 21,100' Tuscaloosa Sand, Reservoir A was previously defined in Office of Conservation Order No. 1046-D, effective June 2, 1998 and is hereby further defined in the 21,100' TUSC RA SUL as being that gas and condensate bearing sand encountered between the depths of 21,345 feet and 21,538 feet (electrical log measurements) in the Pennington Oil & Gas Interests, LLC-Bomer Blanks No. 1 Well, located in Section 10, Township 5 South, Range 9 East, Pointe Coupee Parish, Louisiana.

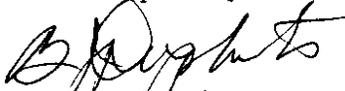
Attached hereto and made a part hereof is a plat outlining the Lower Tuscaloosa Sand, Reservoir A SUL, 20,800' Tuscaloosa Sand, Reservoir A SUL and 21,100' Tuscaloosa Sand, Reservoir A SUL in the Judge Digby Field, Pointe Coupee Parish, Louisiana and a list of the names and addresses of the interested owners, represented parties and interested parties to whom this application is being sent. It is hereby certified that a reasonable effort was made to ascertain the names and addresses of all interested owners, represented parties and interested parties.

A copy of the list of the names and addresses of the interested owners, represented parties and interested parties is not being mailed to those parties along with this application. Should any such party desire a copy of this list, however, we will be glad to provide one upon request.

Pertinent information concerning this proposal can be obtained by contacting Mr. Chip LeBlanc of LeBlanc Geological, Inc., 2121 Ridgelake Dr., Suite 104, Metairie, LA 70001, Telephone No. (504) 828-8700.

Finally, there is enclosed our check on behalf of the applicant in the amount of \$2,265.00, made payable to the Office of Conservation, which represents the required hearing application fee.

Yours very truly,



B. J. Duplantis

Enclosures

cc: Mr. Richard Hudson
District Manager, Office of Conservation

Interested Owners, Represented Parties
and Interested Parties

