

# BLANCHARD WALKER

A TRADITION OF EXCELLENCE SINCE 1917

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

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Shreveport, LA 71101  
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Fax: 318.227.2967  
Web: www.bwor.com

January 14, 2009

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

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

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

RE: HEARING APPLICATION  
Hosston Sand, Reservoir A  
Cotton Valley Formation, Reservoir A  
Haynesville Zone, Reservoir A  
Bethany - Longstreet Field  
DeSoto Parish, Louisiana  
Our File No. 230593.250

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 Hosston Sand, Reservoir A, Cotton Valley Formation, Reservoir A, and Haynesville Zone, Reservoir A, in the Bethany - Longstreet Field, DeSoto Parish, Louisiana:

1. To create an additional drilling and production unit (to be designated as HOSS RA SU107), as shown on the plat attached hereto, for the exploration for and production of gas and condensate from the Hosston Sand, Reservoir A, in the Bethany - Longstreet Field, DeSoto Parish, Louisiana;
2. To create three (3) additional drilling and production units (to be designated as CV RA SU120 thru CV RA SU122), as shown on the plat attached hereto, for the exploration for and production of gas and condensate from the Cotton Valley Formation, Reservoir A, in the Bethany - Longstreet Field, DeSoto Parish, Louisiana;
3. To create three (3) additional drilling and production units (to be designated as HA RA SUQQ thru HA RA SUSS), 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 Bethany - Longstreet Field, DeSoto Parish, Louisiana;
4. 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.
5. To designate a unit operator and unit wells for said units, if appropriate.
6. To redefine the Haynesville Zone, Reservoir A, in the Bethany - Longstreet Field, INsofar AND ONLY INsofar AS TO the proposed HA RA SUQQ thru HA RA SUSS, as being that gas and condensate bearing interval encountered between the depths of 10,230

feet and 11,730 feet (electrical log measurements) in the Coronado Energy E & P Company, LLC - Miller Land Co. Ltd. 10 No. 1 Well, located in Section 10, Township 13 North, Range 16 West, DeSoto Parish, Louisiana.

7. To permit the Applicant to drill, designate and utilize a unit well for the proposed HOSS RA SU107, at the location shown on the plat attached hereto, in exception to the spacing provisions of the Office of Conservation 289-A-g Series of Orders.
8. To permit the Applicant to drill, designate and utilize unit wells for the proposed CV RA SU121 and CV RA SU122, respectively, at the locations shown on the plat attached hereto, in exception to the spacing provisions of the Office of Conservation Order No. 289-J, effective March 1, 1974.
9. To provide that, with respect to future horizontal wells drilled to the Haynesville Zone, Reservoir A, in the proposed units and in the Bethany - Longstreet Field, 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 wells will be calculated based on the distance to the nearest perforation in the well, and not based on the penetration point or terminus.
10. To authorize the downhole combination of production from the Hosston Sand, Reservoir A, Cotton Valley Formation, Reservoir A and the Haynesville Zone, Reservoir A, or any combination thereof, at the operator's discretion, in the wellbore of any well drilled on CV RA SU120 and HA RA SUQQ; CV RA SU121 and HA RA Surr; HOSS RA SU107, CV RA SU122 and HA RA SUSS, respectively, in the Bethany - Longstreet Field, DeSoto Parish, Louisiana, as to which the acreage and ownership are identical.
11. To explicitly find that said downhole combination of production is in the interest of conservation, will prevent waste and will maximize the efficient and economic recovery of gas and condensate from such zones and reservoirs.
12. Except to the extent contrary herewith, to extend the provisions of the 289-A-G and 289-J Series of Orders to the proposed Hosston and Cotton Valley units, respectively.
13. Except to the extent contrary herewith, to extend the provisions of the 289-R Series to the proposed Haynesville Zone, Reservoir A units.
14. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Hosston Sand, Reservoir A, in the Bethany - Longstreet Field, was fully defined in Office of Conservation Order No. 289-A-g-2, effective April 14, 1977.

The Cotton Valley Formation, Reservoir A, in the Bethany - Longstreet Field, was initially defined in Office of Conservation Order No. 289-J, effective March 1, 1974.

The Haynesville Zone, Reservoir A, in the Bethany - Longstreet Field, DeSoto Parish, Louisiana, was defined in Office of Conservation Order No. 289-R, effective April 1, 2008, but shall be redefined as to the proposed units as set forth above.

Pertinent data regarding this application will be available for inspection at the offices of Blanchard, Walker, O'Quin & Roberts, 400 Texas Street, Suite 1400, Shreveport, Louisiana 71101. Any person wishing to inspect such data should call Mr. Wm. Timothy Allen III (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. A copy of this notice, with the annexed plats, 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 December 23, 2008, 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 \$2,265.00 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.

***You may have received this Hearing Application even though your property 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

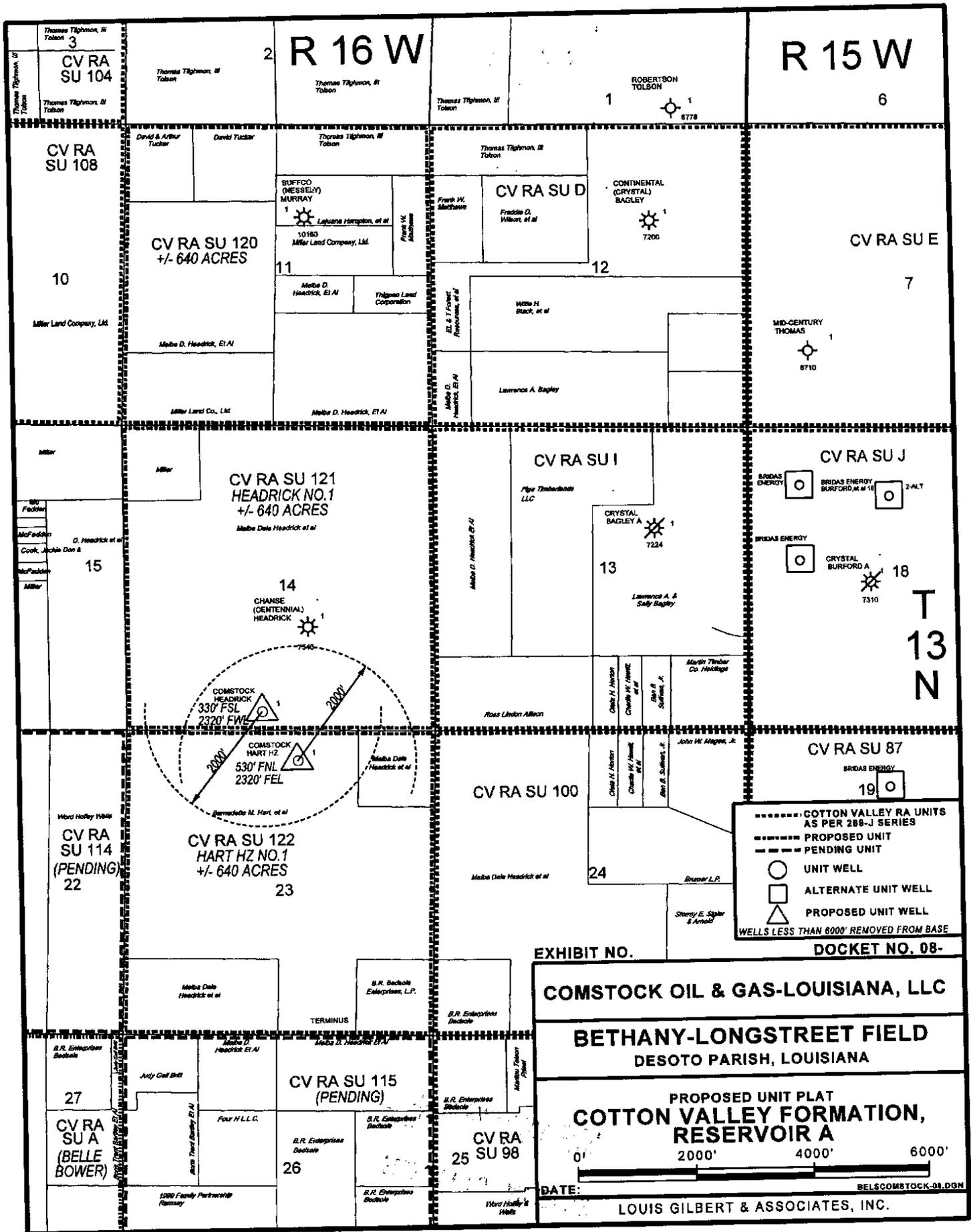
By:   
Wm. Timothy Allen III

Attorneys for Comstock Oil & Gas - Louisiana, LLC

WTAIII:kmw  
Enclosures

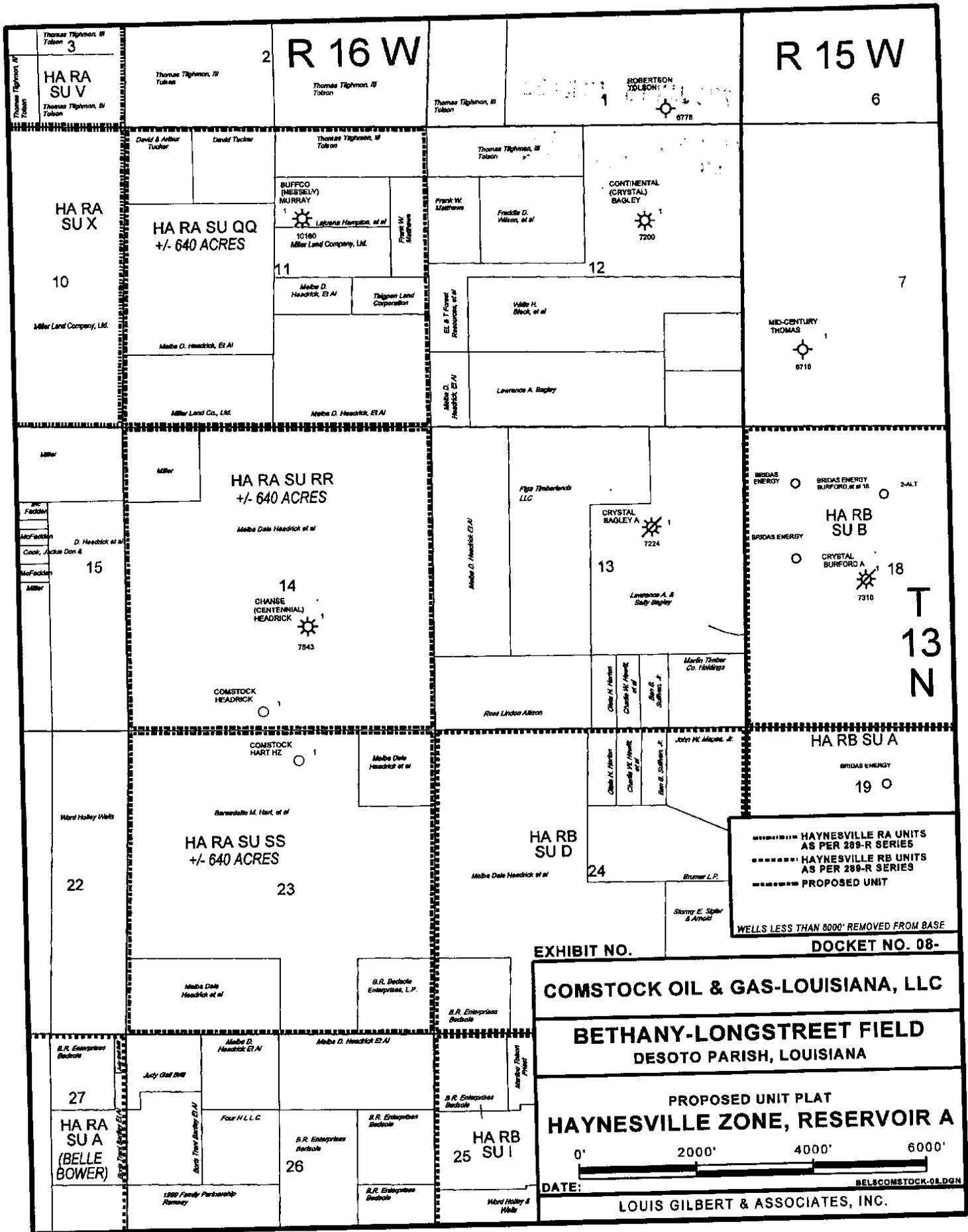
cc: Mr. James C. Broussard  
Office of Conservation, Shreveport District Manager, La. (w/enclosures)  
cc: Interested Owners, Represented Parties  
and Interested Parties (w/copy of plats only)





- - - - - COTTON VALLEY RA UNITS AS PER 288-J SERIES  
 - - - - - PROPOSED UNIT  
 - - - - - PENDING UNIT  
 ○ UNIT WELL  
 □ ALTERNATE UNIT WELL  
 △ PROPOSED UNIT WELL  
 WELLS LESS THAN 6000' REMOVED FROM BASE

EXHIBIT NO. \_\_\_\_\_ DOCKET NO. 08-  
**COMSTOCK OIL & GAS-LOUISIANA, LLC**  
**BETHANY-LONGSTREET FIELD**  
**DESOTO PARISH, LOUISIANA**  
 PROPOSED UNIT PLAT  
**COTTON VALLEY FORMATION, RESERVOIR A**  
 0' 2000' 4000' 6000'  
 DATE: \_\_\_\_\_ BELSCOMSTOCK-08.DWG  
**LOUIS GILBERT & ASSOCIATES, INC.**



Thomas Tipton, III  
Tolson  
3  
HA RA  
SU V

HA RA  
SU X  
10  
Miller Land Company, Ltd.

Miller

McFadden  
D. Headrick et al  
Cook, Justice Don &  
15  
Miller

Ward Holley Wells  
22

HA RA SU SS  
+/- 640 ACRES  
23  
Benedetto M. Hart, et al

B.R. Enterprises  
Bedsicle  
27  
HA RA  
SU A  
(BELLE  
BOWER)

1999 Family Partnership  
Partnership

2  
Thomas Tipton, III  
Tolson

HA RA SU QQ  
+/- 640 ACRES  
11  
Miller Land Company, Ltd.  
Mable D. Headrick, Et Al  
Miller Land Co., Ltd.

HA RA SU RR  
+/- 640 ACRES  
14  
CHANGE  
(CENTENNIAL)  
HEADRICK  
7543  
COMSTOCK  
HEADRICK  
Mable Dale Headrick et al

COMSTOCK  
HART HZ  
1  
Mable Dale Headrick et al

B.R. Enterprises  
Bedsicle  
26  
HA RA  
SU A  
(BELLE  
BOWER)

1999 Family Partnership  
Partnership

R 16 W

Thomas Tipton, III  
Tolson  
11  
BUFFCO  
(MESSELY)  
MURRAY  
Lebruna Hampton, et al  
10190  
Miller Land Company, Ltd.  
Mable D. Headrick, Et Al  
Thigpen Land  
Cooperator  
Mable D. Headrick, Et Al

HA RB  
SU D  
24  
Mable Dale Headrick et al

B.R. Bedsicle  
Enterprises, L.P.  
B.R. Enterprises  
Bedsicle  
B.R. Enterprises  
Bedsicle  
B.R. Enterprises  
Bedsicle  
B.R. Enterprises  
Bedsicle

HA RB  
SU I  
25

Ward Holley &  
Wells

Thomas Tipton, III  
Tolson

Thomas Tipton, III  
Tolson  
12  
Frank W.  
Matthews  
Freddie G.  
Wilson, et al  
CONTINENTAL  
(CRYSTAL)  
BAGLEY  
7200  
Vilma H.  
Black, et al  
Lawrence A. Bagley

HA RB  
SU B  
18  
CRYSTAL  
BAGLEY A  
7224  
Lawrence A. &  
Sally Bagley  
Figo Timberlands  
LLC  
Mable D. Headrick Et Al

HA RB  
SU A  
19  
BRIDAS ENERGY  
BRIDAS ENERGY  
BURFORD, et al  
CRYSTAL  
BURFORD A  
7310  
Martin Timber  
Co. Holdings  
John W. Moore, Jr.  
Starry E. Spier  
& Arnold

HA RB  
SU B  
18  
BRIDAS ENERGY  
BRIDAS ENERGY  
BURFORD, et al  
CRYSTAL  
BURFORD A  
7310

Ward Holley &  
Wells

ROBERTSON  
TOLSON  
6776

CONTINENTAL  
(CRYSTAL)  
BAGLEY  
7200

CRYSTAL  
BAGLEY A  
7224  
Lawrence A. &  
Sally Bagley

HA RB  
SU A  
19  
BRIDAS ENERGY  
BRIDAS ENERGY  
BURFORD, et al  
CRYSTAL  
BURFORD A  
7310

HA RB  
SU B  
18  
BRIDAS ENERGY  
BRIDAS ENERGY  
BURFORD, et al  
CRYSTAL  
BURFORD A  
7310

Ward Holley &  
Wells

R 15 W  
6

MID-CENTURY  
THOMAS  
6710

HA RB  
SU B  
18  
CRYSTAL  
BURFORD A  
7310

HA RB  
SU A  
19  
BRIDAS ENERGY  
BRIDAS ENERGY  
BURFORD, et al  
CRYSTAL  
BURFORD A  
7310

HA RB  
SU B  
18  
BRIDAS ENERGY  
BRIDAS ENERGY  
BURFORD, et al  
CRYSTAL  
BURFORD A  
7310

Ward Holley &  
Wells

T 13 N

--- HAYNESVILLE RA UNITS  
AS PER 289-R SERIES  
- - - HAYNESVILLE RB UNITS  
AS PER 289-R SERIES  
- - - PROPOSED UNIT  
WELLS LESS THAN 8000' REMOVED FROM BASE

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**DESOTO PARISH, LOUISIANA**  
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0' 2000' 4000' 6000'  
DATE: BELSCOMSTOCK-08.DGN  
**LOUIS GILBERT & ASSOCIATES, INC.**