

# BLANCHARD WALKER

A TRADITION OF EXCELLENCE SINCE 1917

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

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January 8, 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  
Haynesville Zone, Reservoir A  
Cotton Valley Formation, Reservoir A  
Lower Hosston Formation, Reservoir A  
Upper Hosston Formation, Reservoir A  
Belle Bower Field  
DeSoto Parish, Louisiana  
Our File No. 230593.238

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, Cotton Valley Formation, Reservoir A, Lower Hosston Formation, Reservoir A, and Upper Hosston Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana:

1. To create two (2) drilling and production units (to be designated as HA RA SUI and HA RA SUJ) for the exploration for and production of gas and condensate from the Haynesville Zone, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, as shown on the plat attached hereto;
2. To create four (4) additional drilling and production units (to be designated as CV RA SUL thru CV RA SUO) for the exploration for and production of gas and condensate from the Cotton Valley Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, as shown on the plat attached hereto;
3. To create four (4) additional drilling and production units (to be designated as L HOSS RA SUN thru L HOSS RA SUQ) for the exploration for and production of gas and condensate from the Lower Hosston Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, as shown on the plat attached hereto;
4. To force pool and unitize all separately owned tracts, mineral leases, and other property interests within the proposed units, with allocation of production to each of the tracts within such units to be on the basis of surface acreage;
5. To designate Comstock Oil & Gas - Louisiana, LLC as unit operator and to designate unit wells for certain of said units, if appropriate.

6. To provide that, with respect to future horizontal wells drilled to the Haynesville Zone, Reservoir A, in the proposed units and in the Belle Bower 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;
7. To permit the downhole combination of production from the Cotton Valley Formation, Reservoir A, Lower Hosston Formation, Reservoir A, and Upper Hosston Formation, Reservoir A, in CV RA SUL, L HOSS RA SUN and U HOSS RA SUQQ; CV RA SUM, L HOSS RA SUO, and U HOSS RA SUU; CV RA SUN, L HOSS RA SUP, and U HOSS RA SURR; and CV RA SUO, L HOSS RA SUQ, and U HOSS RA SUT, or from any combination thereof, in any well drilled on such units in which the acreage and ownership interests in the units from which production is combined downhole are identical;
8. To consider such other matters and issue such orders as may be appropriate and justified by the evidence presented at the hearing.

The Upper Hosston Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 312-C, effective December 16, 1977.

The Lower Hosston Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 312-D, effective December 16, 1977.

The Cotton Valley Formation, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, was defined in Office of Conservation Order No. 312-E, effective December 16, 1977.

The Haynesville Zone, Reservoir A, in the Belle Bower Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 312-G, effective July 29, 2008.

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.

By Pre-Application Notice dated November 19, 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 \$5,285.00 made payable to the Commissioner of Conservation is enclosed herewith as the statutory fee for holding the requested hearing.

Commissioner of Conservation  
January 8, 2009  
Page 3

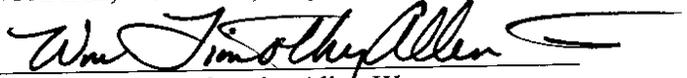
This application is being filed in duplicate, and a copy hereof is being sent to Mr. James C. Broussard, Shreveport District Manager of the Office of Conservation, and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

***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

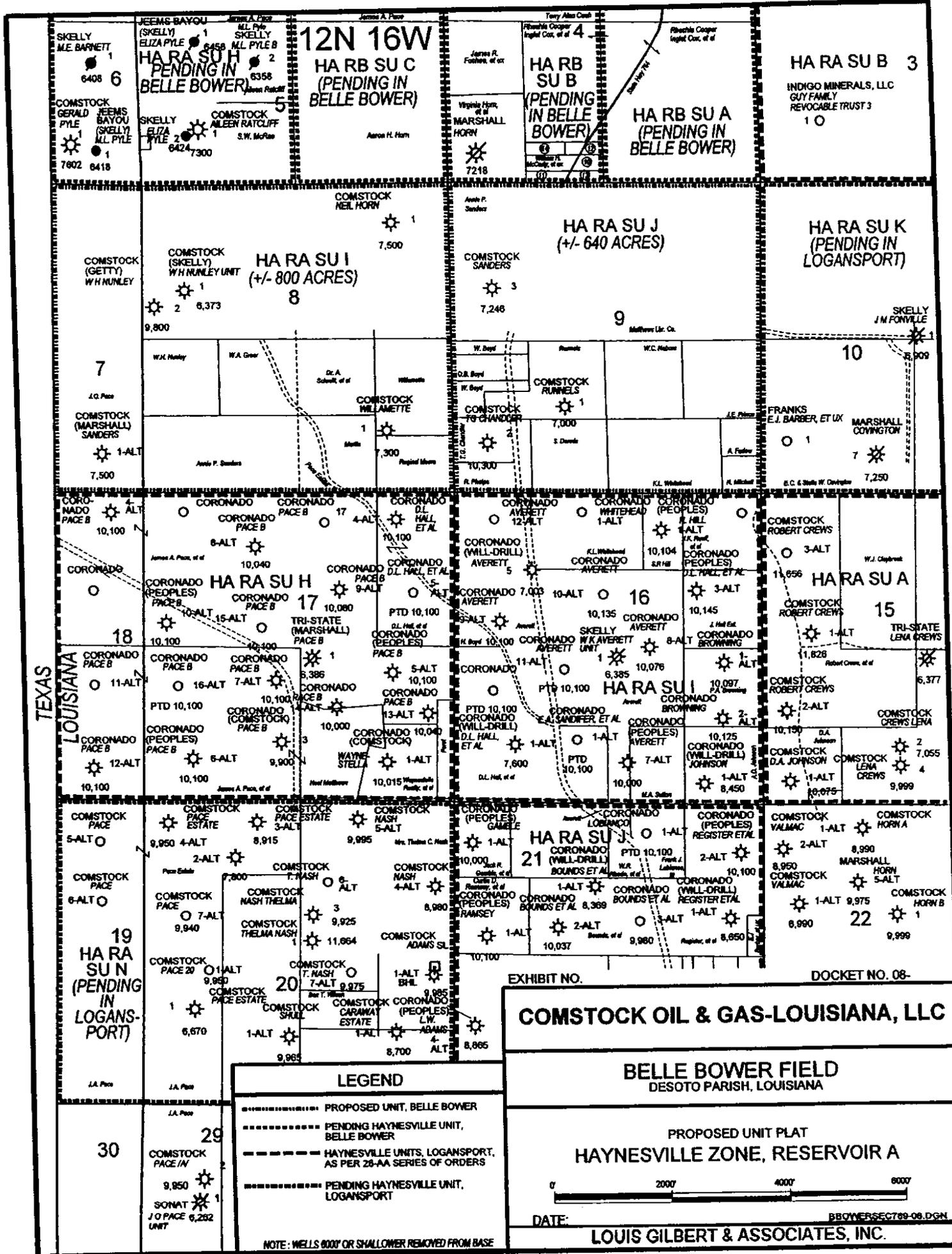
By: 

Wm. Timothy Allen III

Attorneys for Comstock Oil & Gas - Louisiana, LLC

WTAH:kpw  
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)



12N 16W  
 HA RB SU C  
 (PENDING IN BELLE BOWER)

HA RB SU B  
 (PENDING IN BELLE BOWER)

HA RB SU A  
 (PENDING IN BELLE BOWER)

HA RA SU B 3  
 INDIGO MINERALS, LLC  
 GUY FAMILY  
 REVOCABLE TRUST 3  
 10

HA RA SU I  
 (+/- 800 ACRES)  
 8

HA RA SU J  
 (+/- 640 ACRES)  
 9

HA RA SU K  
 (PENDING IN LOGANS-  
 PORT)

HA RA SU H  
 17

HA RA SU I  
 16

HA RA SU A  
 15

HA RA SU J  
 21

HA RA SU N  
 (PENDING IN LOGANS-  
 PORT)

**LEGEND**

- PROPOSED UNIT, BELLE BOWER
- PENDING HAYNESVILLE UNIT, BELLE BOWER
- HAYNESVILLE UNITS, LOGANS-PORT, AS PER 28-AA SERIES OF ORDERS
- PENDING HAYNESVILLE UNIT, LOGANS-PORT

EXHIBIT NO. **COMSTOCK OIL & GAS-LOUISIANA, LLC**

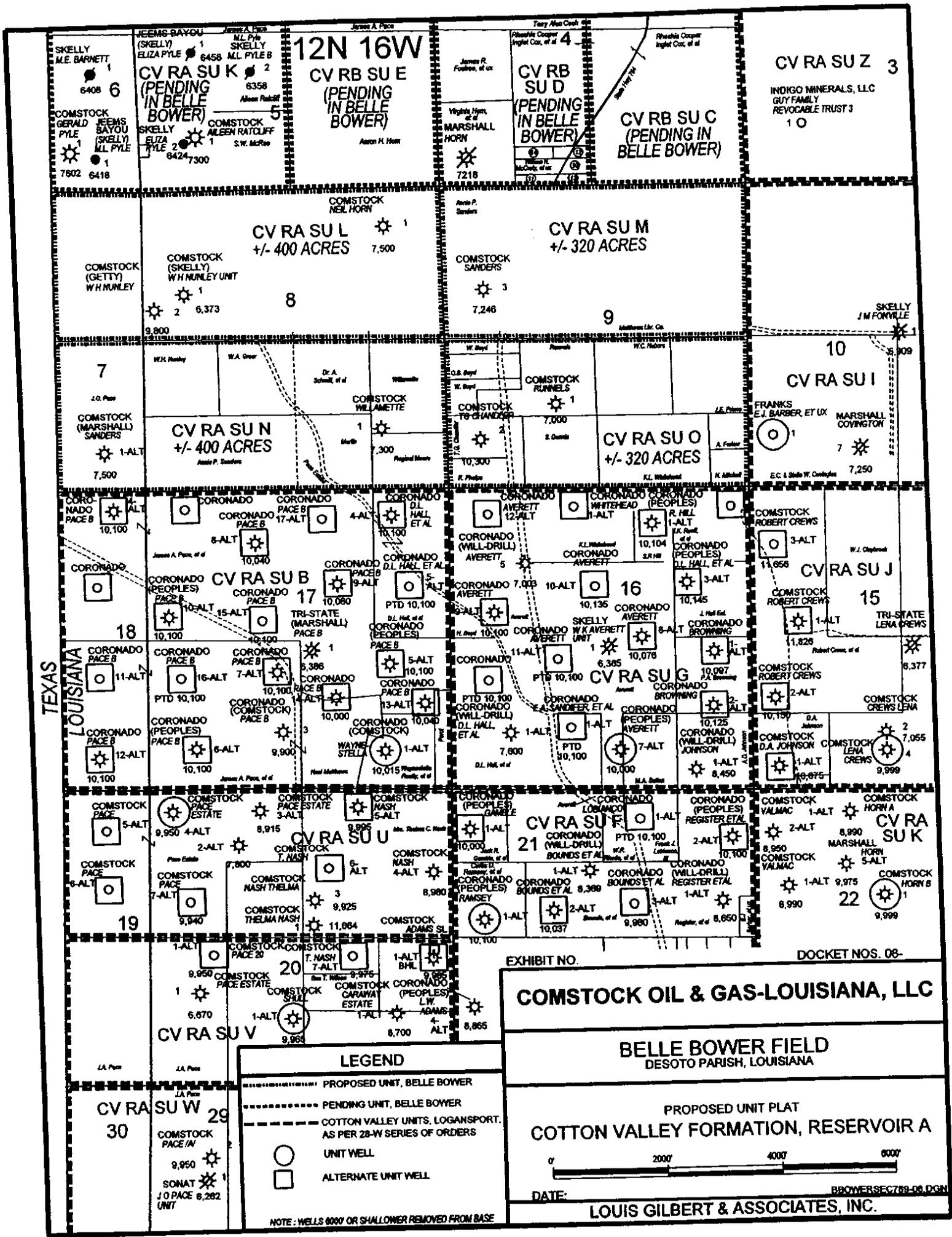
**BELLE BOWER FIELD**  
 DESOTO PARISH, LOUISIANA

PROPOSED UNIT PLAT  
**HAYNESVILLE ZONE, RESERVOIR A**



DATE: \_\_\_\_\_ BLOWERSECT09-06.DGN  
**LOUIS GILBERT & ASSOCIATES, INC.**

NOTE: WELLS 800' OR SHALLOWER REMOVED FROM BASE



12N 16W  
CV RB SU E  
(PENDING IN BELLE BOWER)

CV RA SU Z 3  
INDIGO MINERALS, LLC  
GUY FAMILY REVOCABLE TRUST 3  
10

CV RA SU K 2  
(PENDING IN BELLE BOWER)

CV RB SU D  
(PENDING IN BELLE BOWER)

CV RB SU C  
(PENDING IN BELLE BOWER)

CV RA SU L  
+/- 400 ACRES 7,500

CV RA SU M  
+/- 320 ACRES

COMSTOCK (SKELLY) W H NUNLEY UNIT

COMSTOCK SANDERS

CV RA SU N  
+/- 400 ACRES

CV RA SU O  
+/- 320 ACRES

CV RA SU I

CV RA SU B

CV RA SU J

CV RA SU G

CV RA SU F

CV RA SU K

CV RA SU V

CV RA SU W

LEGEND

- PROPOSED UNIT, BELLE BOWER
- - - - - PENDING UNIT, BELLE BOWER
- - - - - COTTON VALLEY UNITS, LOGANSPORT, AS PER 28-W SERIES OF ORDERS
- UNIT WELL
- ALTERNATE UNIT WELL

COMSTOCK OIL & GAS-LOUISIANA, LLC

BELLE BOWER FIELD  
DESOTO PARISH, LOUISIANA

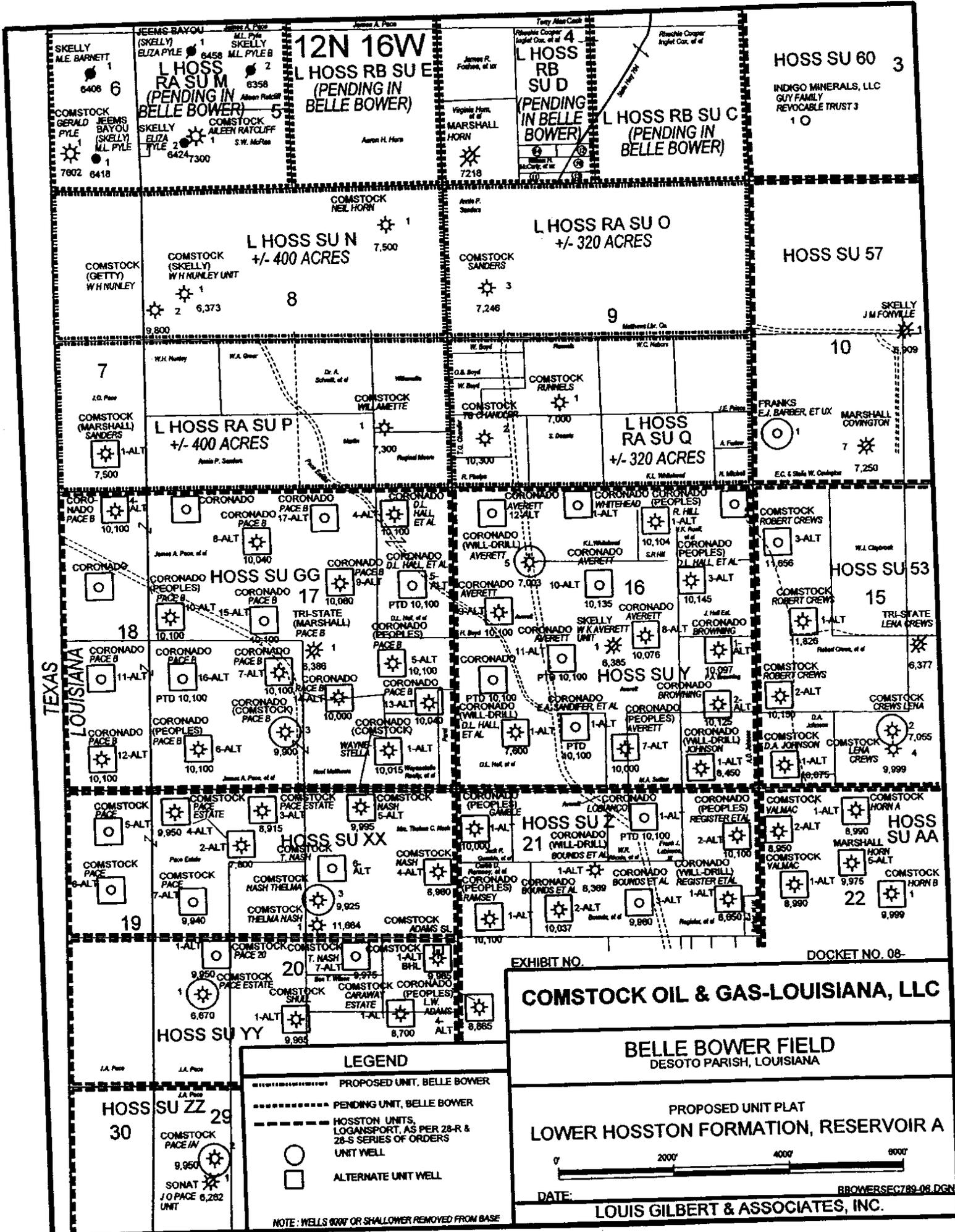
PROPOSED UNIT PLAT  
COTTON VALLEY FORMATION, RESERVOIR A



DATE: LOUIS GILBERT & ASSOCIATES, INC.

NOTE: WELLS 8000' OR SHALLOWER REMOVED FROM BASE

BROWERS ECT 782-06.DGM



12N 16W  
L HOSS RB SU E  
(PENDING IN BELLE BOWER)

HOSS SU 60 3  
INDIGO MINERALS, LLC  
GUY FAMILY  
REVOCABLE TRUST 3  
1 0

L HOSS SU N  
+/- 400 ACRES  
7,500

L HOSS RA SU O  
+/- 320 ACRES  
7,246

HOSS SU 57

L HOSS RA SU P  
+/- 400 ACRES  
7,500

L HOSS RA SU Q  
+/- 320 ACRES  
7,000

HOSS SU GG  
17  
10,080

HOSS SU Y  
10,076

HOSS SU 53  
15  
11,828

HOSS SU Z  
21  
10,000

HOSS SU AA  
22  
9,999

HOSS SU ZZ  
30  
9,950

**LEGEND**

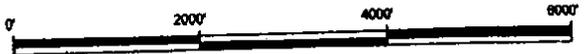
- PROPOSED UNIT, BELLE BOWER
- PENDING UNIT, BELLE BOWER
- HOSSTON UNITS, LOGANSPORT, AS PER 28-R & 28-S SERIES OF ORDERS
- UNIT WELL
- ALTERNATE UNIT WELL

NOTE: WELLS 600' OR SHALLOWER REMOVED FROM BASE

**COMSTOCK OIL & GAS-LOUISIANA, LLC**

**BELLE BOWER FIELD**  
DESOTO PARISH, LOUISIANA

PROPOSED UNIT PLAT  
**LOWER HOSSTON FORMATION, RESERVOIR A**



DATE: \_\_\_\_\_  
BROWERSEC789-08.DGN  
**LOUIS GILBERT & ASSOCIATES, INC.**