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February 13, 2009

12152-69074

APPLICATION

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

RE: 13800' Sand, Reservoir A
Little Lake Field
Jefferson Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **JGC ENERGY DEVELOPMENT (USA) INC.**, for the calling of a public hearing, after thirty (30) days legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters related to the **13800' Sand, Reservoir A**, in the **Little Lake Field**, Jefferson Parish, Louisiana, to-wit:

1. To establish rules and regulations and create a single drilling and production unit for the exploration for and production of gas and condensate, such unit to be designated 13800 RA SUA;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;
3. To provide that any future wells drilled to the 13800' Sand, Reservoir A, within or outside of the proposed unit, should be

located in accordance with the spacing provisions of Statewide Order 29-E;

4. To provide that the Commissioner of Conservation should be authorized to reclassify the 13800' Sand, Reservoir A, by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation; and
5. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The 13800' Sand, Reservoir A, in the Little Lake Field, Jefferson Parish, Louisiana, is hereby defined as being that stratigraphic bearing interval encountered between the depths of 13,660 feet and 13,940 feet (electrical log measurements) in the North American Royalties - SL 2383 No.1 Well located in Township 18 South, Range 23 East, Jefferson Parish, Louisiana.

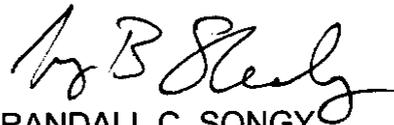
The pre-application conference tentatively scheduled for February 20, 2009, WILL NOT BE HELD, as it was not requested within the delays provided for by the Rules of Procedure; therefore, no opposition to this Application at the hearing is anticipated.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting Bill McAlister, with Leon Comeaux & Associates, 305 La Rue France, Lafayette, LA 70508 (337) 233-9839.

There is attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. 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 Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$755.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,



RANDALL C. SONGY
JEREMY B. SHEALY

RCS/JBS/smp/bad
Enclosures

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

Interested owners, Interested Parties
and Represented Parties

P.S. To all Interested Owners, Represented Parties and Interested Parties:

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

Your receipt of this 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.

