

HARGROVE, SMELLEY, STRICKLAND & LANGLEY

JOSEPH L. HARGROVE, JR.
DAVID L. SMELLEY
PAUL A. STRICKLAND
GLENN L. LANGLEY
LOUISE F. PEARCE
T. ISSAC HOWELL
MAGAN F. CAUSEY
JULIANNA PETCHAK PARKS
CHAD E. SEPULVADO
B. LEE CARR, JR.

(A PROFESSIONAL LAW CORPORATION)
AMERICAN TOWER, SUITE 600
401 MARKET STREET
SHREVEPORT, LOUISIANA 71101-3239

THOMAS J. WYATT (1942-1996)

MAILING ADDRESS
POST OFFICE BOX 59
SHREVEPORT, LOUISIANA 71161-0059
TELEPHONE (318) 429-7200
TELECOPIER (318) 429-7201

February 25, 2009

OF COUNSEL
WILLIAM G. CONLY

Honorable James H. Welsh
Commissioner of Conservation
State of Louisiana
Post Office Box 44275
Baton Rouge, Louisiana 70804-4275

Re: APPLICATION FOR PUBLIC HEARING

Hosston Formation, Reservoir A; Upper
Cotton Valley Formation, Reservoir A; and
Lower Cotton Valley Formation, Reservoir A;
VERNON FIELD, Jackson Parish, Louisiana.

Dear Sir:

CHESAPEAKE OPERATING, INC. ("Applicant"), hereby respectfully applies for a public hearing to consider evidence relative to the issuance of Orders pertaining to the following matters relating to the Hosston Formation, Reservoir A; the Upper Cotton Valley Formation, Reservoir A; and to the Lower Cotton Valley Formation, Reservoir A; all in the Vernon Field, Jackson Parish, Louisiana:

1. To authorize Applicant to drill, designate and utilize the unit well for HOSS RA SU177 and for UCV RA SU177, and a substitute unit well for LCV RA SU177, at the location shown on the attached plats, or at any location which is within a radius of fifty (50) feet of the location shown on the attached plats.
2. To approve exceptions to the spacing provisions of Office of Conservation Order No. 798-A-8, effective January 22, 2002 (applicable to the Hosston Formation, Reservoir A); Order No. 798-C-10, effective January 22, 2002 (applicable to the Upper Cotton Valley Formation, Reservoir A); and Order No. 798-B-23, effective January 22, 2002 (applicable to the Lower Cotton Valley Formation, Reservoir A), for the location of the proposed well.
3. To find that a substitute unit well for LCV RA SU177 is necessary to efficiently and economically drain a portion of the hydrocarbons underlying this unit which cannot be efficiently and economically drained by any existing well on the unit.
4. To consider such other matters as may be pertinent to this application.

The Hosston Formation, Reservoir A, in the Vernon Field, Jackson Parish, Louisiana, was initially defined in Office of Conservation Order No. 798-A, effective February 28, 1980, and was further defined in Office of Conservation Order No. 798-A-1, effective August 18, 1982.

The Upper Cotton Valley Formation, Reservoir A, in the Vernon Field, Jackson Parish, Louisiana, is defined in Office of Conservation Order No. 798-C-10, effective January 22, 2002.

Honorable James H. Welsh
February 25, 2009
Page 2

The Lower Cotton Valley Formation, Reservoir A, in the Vernon Field, Jackson Parish, Louisiana, was defined in Office of Conservation Order No. 798-B-23, effective January 22, 2002, and was redefined as to LCV RA SU177 by Order No. 798-B-123, effective January 16, 2008.

Any pertinent data concerning this application will be available for inspection at the offices of Mr. Joe B. Adams, 21010 Vermont Street, Livingston, Louisiana 70754. Any person wishing to inspect any such data should call Mr. Adams at (225) 686-2355 during normal business hours in order to arrange a date and time for such inspection. A copy of any such pertinent data which is not otherwise available from the records of the Louisiana Office of Conservation can be obtained from Applicant at the expense of the requesting party.

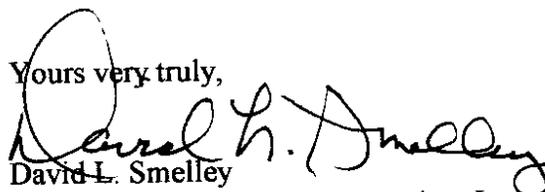
As provided by the Revised Rules of Procedure, the subject matter of this application does not require the issuance of a pre-application notice; therefore, no such notice has been issued.

Pursuant to the aforesaid Rules of Procedure, Applicant has made a reasonable effort to obtain the names and addresses of all Interested Owners, Represented Parties and Interested Parties to whom notice of this application is being sent and has attached hereto a list of the names and addresses of such parties. A copy of this letter, and of each of the attached plats, is being sent to the District Manager of the Shreveport District of the Office of Conservation and to the Interested Owners, Represented Parties and Interested Parties, as shown on the attached list.

Applicant will provide for posting of a copy of the Legal Notice of this hearing and the enclosed plats at a prominent place in the area affected and will cause publication of the Legal Notice in a newspaper published in the general area of Vernon Field, all in accordance with the Revised Rules of Procedure. Furthermore, Applicant will mail a copy of the Legal Notice to all Interested Owners, Represented Parties and Interested Parties promptly upon receipt of the Legal Notice from the Commissioner.

Finally, enclosed herewith is our check payable to the Office of Conservation covering the application fee.

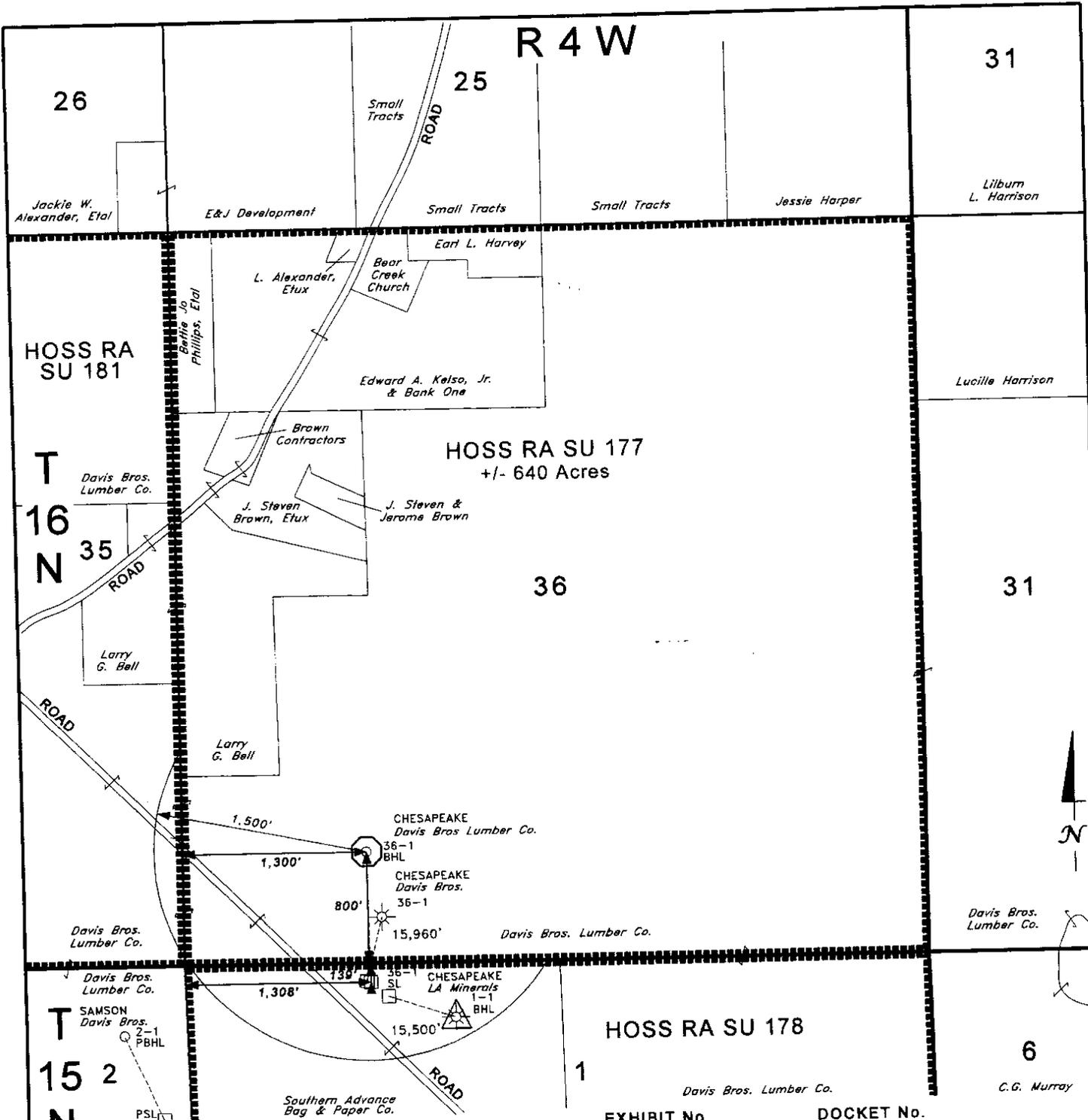
Yours very truly,


David L. Smelley
-- Attorney for Chesapeake Operating, Inc.

DLS:dp

Enclosures

cc: Mr. James C. Broussard (w/encls.)
Ms. Denise Cramer (w/encls.)
Mr. Joe B. Adams (w/encls.)
Interested Owners, Represented Parties
and Interested Parties (w/plats only)



-  - PROPOSED SUBSTITUTE UNIT WELL
-  - ALTERNATE UNIT WELL
-  - EXISTING HOSS UNITS

NOTE: ALL UNIT BOUNDARIES ARE GEOGRAPHIC.
 NOTE: 1,500' RADIUS MEASURED INTO ADJACENT UNITS.


 Geo-Draft, Inc.
 (504) 836-2882

EXHIBIT No. _____ DOCKET No. _____
CHESAPEAKE OPERATING, INC.

VERNON FIELD
 JACKSON PARISH, LOUISIANA

Proposed Unit Well
Hosston Zone, Reservoir A

Date: _____


Geology: JOE B. ADAMS

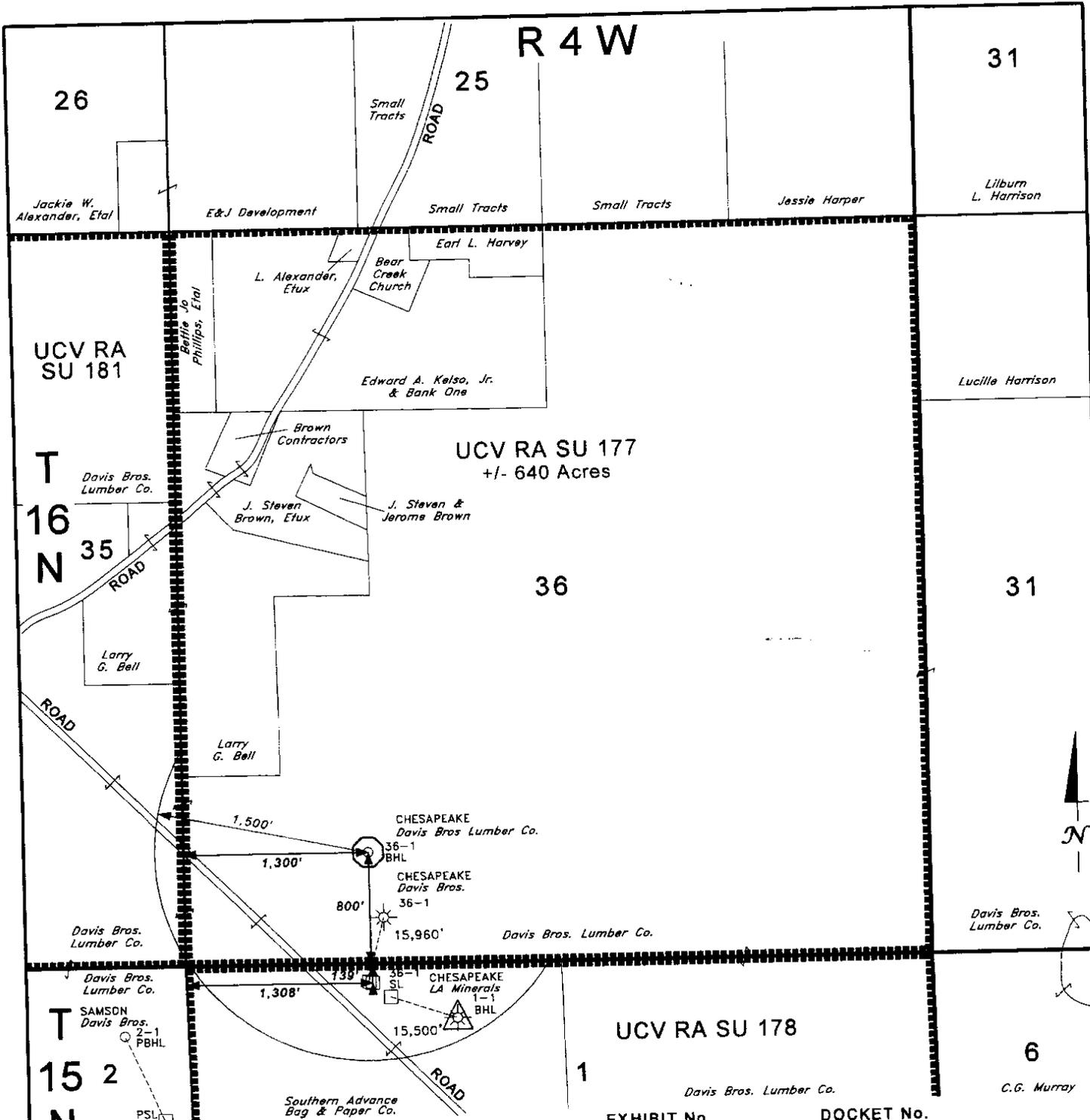


EXHIBIT No. _____ DOCKET No. _____

CHESAPEAKE OPERATING, INC.

VERNON FIELD
JACKSON PARISH, LOUISIANA

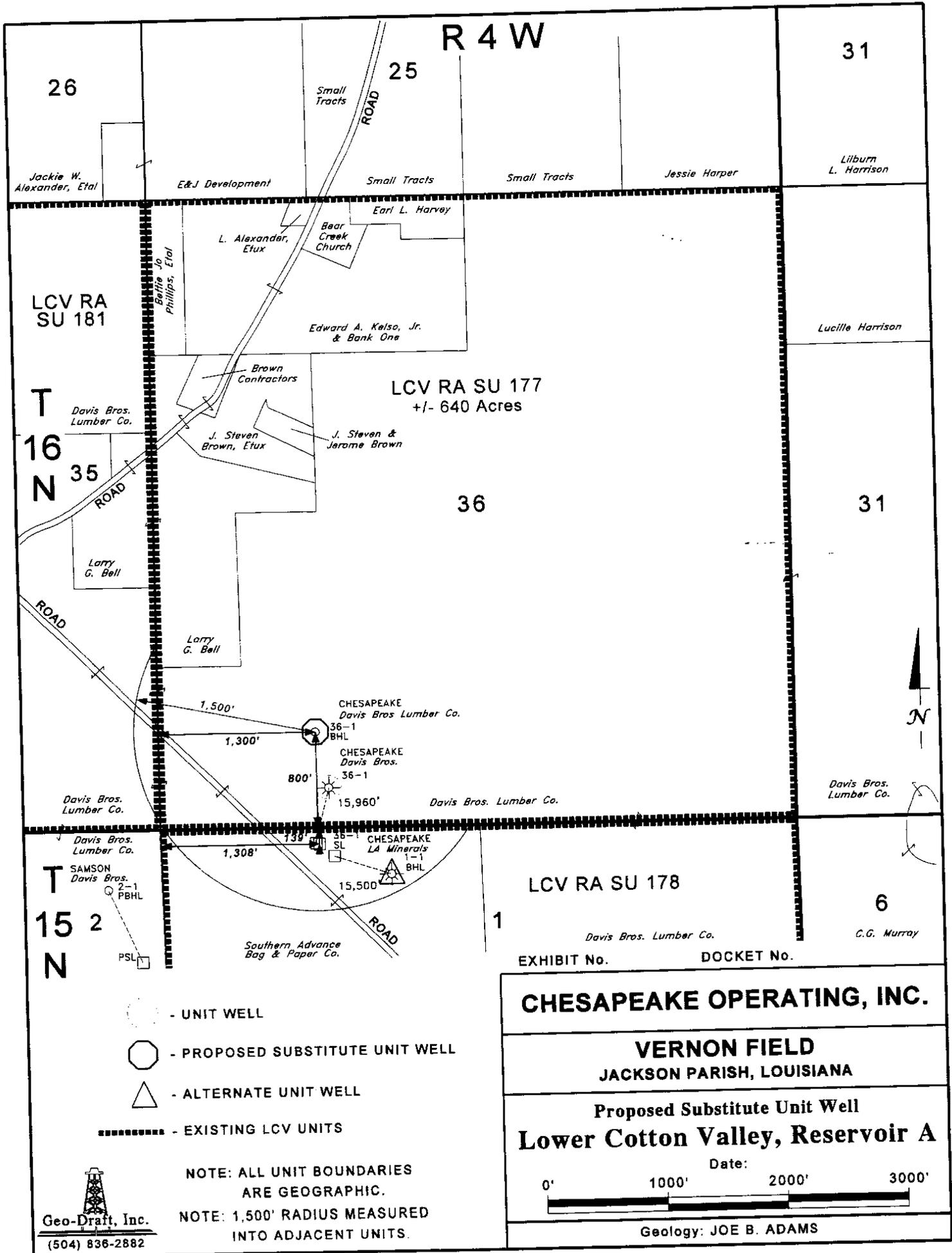
Proposed Unit Well
Upper Cotton Valley, Reservoir A

Date: _____

Geology: JOE B. ADAMS


Geo-Draft, Inc.
(504) 838-2882

NOTE: ALL UNIT BOUNDARIES ARE GEOGRAPHIC.
NOTE: 1,500' RADIUS MEASURED INTO ADJACENT UNITS



R 4 W

31

26

25

Jackie W. Alexander, Etal

E&J Development

Small Tracts

Small Tracts

Jessie Harper

Liburn L. Harrison

LCV RA SU 181

L. Alexander, Etux

Earl L. Harvey

Edward A. Kelso, Jr. & Bank One

Lucille Harrison

T 16 N

LCV RA SU 177 +/- 640 Acres

Davis Bros. Lumber Co.

Brown Contractors

J. Steven Brown, Etux

J. Steven & Jarome Brown

35

36

31

Lorry G. Bell

Lorry G. Bell

CHESAPEAKE Davis Bros Lumber Co. 36-1 BHL

CHESAPEAKE Davis Bros. 36-1

Davis Bros. Lumber Co.

Davis Bros. Lumber Co.

Davis Bros. Lumber Co.

T 15 N

Davis Bros. Lumber Co.

SAMSON Davis Bros. 2-1 PBHL

PSL

CHESAPEAKE LA Minerals 1-1 BHL

Southern Advance Bag & Paper Co.

LCV RA SU 178

Davis Bros. Lumber Co.

6

C.G. Murray

EXHIBIT No.

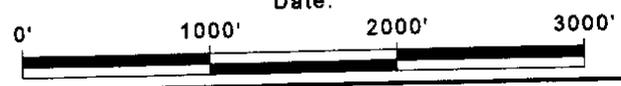
DOCKET No.

CHESAPEAKE OPERATING, INC.

**VERNON FIELD
JACKSON PARISH, LOUISIANA**

**Proposed Substitute Unit Well
Lower Cotton Valley, Reservoir A**

Date:



Geology: JOE B. ADAMS

- UNIT WELL
- PROPOSED SUBSTITUTE UNIT WELL
- ALTERNATE UNIT WELL
- EXISTING LCV UNITS

NOTE: ALL UNIT BOUNDARIES ARE GEOGRAPHIC.
NOTE: 1,500' RADIUS MEASURED INTO ADJACENT UNITS.

Geo-Draft, Inc.
(504) 836-2882