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March 30, 2009

Honorable James H. Welsh
Commissioner of Conservation
La. Department of Natural Resources
Post Office Box 94275
Baton Rouge, Louisiana 70804-9275

IN RE: SUBSTITUTE UNIT WELL AT AN EXCEPTIONAL LOCATION
SAND: 3200' FRIO SAND
POINT BREEZE FIELD
Concordia Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of Axis Onshore, L.P., P. O. Box 507, Vidalia, Louisiana 71373, for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an Order covering the following matters pertaining to the 3200' FRIO SAND, Point Breeze Field, Concordia Parish, Louisiana.

1. To approve a Substitute Unit Well drilled at an exceptional location as to the unit boundary for the production of oil and gas from the 3200' F RA SUC; Hodges C ST No. 9 Well in the Point Breeze Field, Concordia Parish, Louisiana, as shown on the attached Plat and made a part hereof;
2. To name the Axis Onshore, L.P. – 3200' F RA SUC; Hodges C ST No. 9 Well as the Substitute Unit Well at an exceptional location in Section 11, T1N-R9E;
3. To consider and cover such other matters as the Commissioner of Conservation may deem pertinent and appropriate; and
4. To continue in force and effect the remaining provisions of the office of Conservation Order 1397, et sec.

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The 3200' Frio Sand Reservoir A in the Point Breeze Field was fully defined in Office of Conservation Order No. 1397, effective December 6, 1994, and created the unit now known as the 3200' F RA SU C. Order No. 1397-A requires wells drilled to the 3200' Frio Sand, to be located 330 feet from unit lines and 600 feet between any other well completed in this zone. The location of the substitute unit well does not meet those requirements.

The existing unit well, the El Toro Production Co., Inc.; W. H. Hodges & Co. "C" No. 4 well has been plugged and abandoned. The applicant will show by exhibits and testimony that a substitute unit well, at an exceptional location, is needed to drain a portion of the unit which the former well did not drain and that waste will occur by leaving hydrocarbons in the ground that otherwise may be produced.

As seen on the attached Plat, the proposed Axis Onshore, L.P. 3200' F RA SU C; Hodges C No. 9 well is located 338 feet from the West boundary line and 282 feet from the North boundary line of the 3200' F RA SU C as defined and governed by Order No. 1397-A, effective June 12, 2007.

This well was drilled but mechanical problems were encountered there upon Axis Onshore, L.P. pulled back and side-tracked in the Axis Onshore, L.P. Hodges C9 bore hole. As seen on the plat prepared by J, K & S, it shows the surface location for the Axis Onshore, L.P. Hodges C9 well being 338 feet from the West line and 282 feet from the North line of the 3200' F RA SU C. Because of the side tract, the new bottom hole location is 312 feet from the West line and 287 feet from the North line of the 3200' F RA SU C. The new bottom hole is 26 feet Northwest of the original bottom hole location.

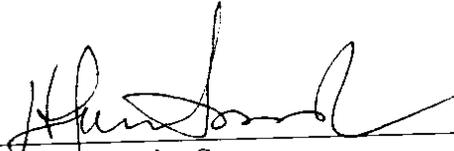
The pertinent data pertaining to this application, including Electric Logs may be obtained, AT THE COST OF THE REQUESTING PARTY, from Jay Stewart, 311 Texas Street, Vidalia, Louisiana, 71373, telephone number (601) 807-1799.

The subject matter of this application does not require a pre-hearing conference. Attached hereto and made a part hereof, is a Plat showing the proposed substitute unit well and a list of the interested Owners, Interested Parties and Represented Parties to whom this notice is being sent. Pursuant to the Revised Rules of Procedure, the list of Parties is being sent to the Commissioner of Conservation and to the District Manager of the Monroe District Office of Conservation. A reasonable effort has been made to ascertain the names and address of all parties to whom this notice is being sent.

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Enclosed, please find Applicant's check in the amount of \$755.00 payable to the Office of Conservation to cover the Application Fee for the subject Sand.

Sincerely,



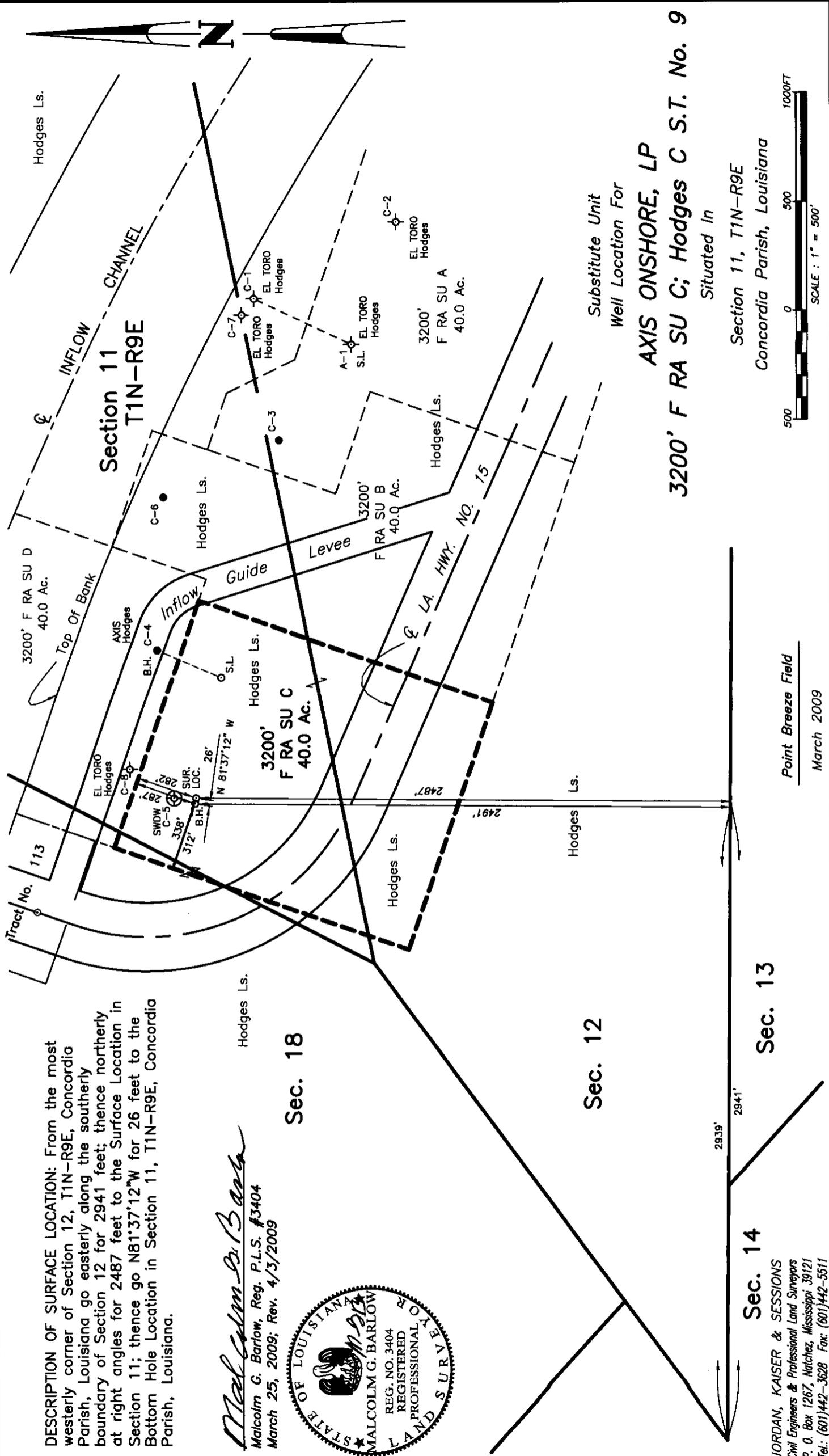
H. James Lossin, Sr.

HJL/ar
Enclosures

xc Honorable James Welsh
 Mr. Joseph DeVall
 Interested Owners
 Represented Parties
 W. H. Hodges & Company, Inc.

DESCRIPTION OF SURFACE LOCATION: From the most westerly corner of Section 12, T1N-R9E, Concordia Parish, Louisiana go easterly along the southerly boundary of Section 12 for 2941 feet; thence northerly at right angles for 2487 feet to the Surface Location in Section 11; thence go N81°37'12"W for 26 feet to the Bottom Hole Location in Section 11, T1N-R9E, Concordia Parish, Louisiana.

Malcolm G. Barlow
 Malcolm G. Barlow, Reg. P.L.S. #3404
 March 25, 2009; Rev. 4/3/2009



Substitute Unit
 Well Location For
AXIS ONSHORE, LP
 Situated In
 Section 11, T1N-R9E
 Concordia Parish, Louisiana

3200' F RA SU C; Hodges C S.T. No. 9

Sec. 14
 JORDAN, KAISER & SESSIONS
 Civil Engineers & Professional Land Surveyors
 P. O. Box 1267, Natchez, Mississippi 39121
 Tel.: (601)442-3628 Fax: (601)442-5511

Sec. 13

Sec. 12

Sec. 18

Point Breeze Field
 March 2009