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April 7, 2009

APPLICATION

7097-69121

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

RE: Haynesville Zone, Reservoir A
HA RA SUA, HA RA SUB, HA RA SUJ,
HA RA SUR, and HA RA SUS
Greenwood-Waskom Field
Caddo Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **CHESAPEAKE OPERATING, 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 **Haynesville Zone, Reservoir A**, in the **Greenwood-Waskom Field**, Caddo Parish, Louisiana, for which rules and regulations were established and a pattern of drilling and production units was created by Office of Conservation Order No. 270-MM, effective June 19, 2007, as amended and supplemented by the 270-MM Series of Orders, to-wit:

1. To redefine the Haynesville Zone, Reservoir A, insofar as HA RA SUA, HA RA SUB, HA RA SUJ, HA RA SUR, and HA RA SUS are concerned, to conform to the definition adopted by Office of Conservation Order 270-MM-2, effective September 16, 2008;
2. To revise the field spacing rules applicable to HA RA SUA, HA RA SUB, and HA RA SUJ, to conform to the spacing rules adopted by

Office of Conservation Order No. 270-MM-2, effective September 16, 2008, which provides that any well drilled to the Haynesville Zone, Reservoir A, should be located no closer than 330 feet from any unit boundary and no closer than 660 feet to any other well completed in, drilling to, or for which a permit has been granted to drill to said reservoir;

3. That with respect to future horizontal wells drilled to the Haynesville Zone, Reservoir A, insofar as HA RA SUA, HA RA SUB, and HA RA SUJ are concerned, to clarify that the method of distance measurement for spacing purposes is consistent with the provisions of Office of Conservation Order No. 270-MM-5, effective December 16, 2008, by expressly providing that 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 any offset wells(s) should be calculated based on the distance to the nearest perforation in the well, and not based on the penetration point or terminus; and
4. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Haynesville Zone, in the Greenwood-Waskom Field, was previously defined in Office of Conservation Order No. 270-MM, effective June 10, 2007, and redefined in Office of Conservation Order No. 270-MM-2, effective September 16, 2008.

The purpose of this filing is to attempt to achieve consistent definition and spacing rules applicable to Haynesville Zone units in the Greenwood-Waskom Field. The pre-application conference tentatively scheduled for April 15, 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.

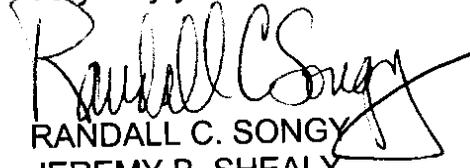
Pertinent data relating to the proposed application can be obtained, **AT THE COST OF THE REQUESTING PARTY**, by contacting David Comeaux, with Leon Comeaux & Associates, 305 La Rue France, Lafayette, LA 70508 (337) 233-9839.

There is attached hereto and made a part hereof a plat outlining the above units to which this notice applies, 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 Shreveport 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.

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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/dmw
Enclosures

cc: Interested Parties

Mr. Jim Broussard, District Manager
Office of Conservation

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.

