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November 24, 2008

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Richard W. Revels, Jr.
rwrevels@liskow.com

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

Re: Cotton Valley Formation, Reservoir A
Haynesville Zone, Reservoir A
Benson Field
DeSoto Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **SWEPI, LP** for the calling of public hearings, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters:

Cotton Valley Formation, Reservoir A

1. To establish rules and regulations and to create three (3) drilling and production units for the exploration for and production of gas and condensate from the Cotton Valley Formation, Reservoir A, in the Benson Field, DeSoto Parish, Louisiana, said units to be designated CV RA SUA, CV RA SUB and CV RA SUC, all as shown on the plat attached hereto and made a part hereof.
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.
3. To provide that any future wells drilled to the Cotton Valley Formation, Reservoir A, in the Benson Field, within or outside the units created herein, should be located in accordance with the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
4. To consider such others matters as may be pertinent.

The Cotton Valley Formation, Reservoir A, in the Benson Field, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing formation encountered between the depths of 9,870 feet and 11,135 feet (electrical log measurements) in the Phillips Petroleum Company – Martin “B” No. 1 Well, located in Section 32, Township 11 North, Range 10 West, Natchitoches Parish, Louisiana.

Haynesville Zone, Reservoir A

1. To create three (3) additional drilling and production units for the exploration for and production of gas and condensate from the Haynesville Zone, Reservoir A, in the Benson Field, DeSoto Parish,

November 24, 2008

Louisiana, said units to be designated HA RA SUB, HA RA SUC and HA RA SUD, all as shown on the plat attached hereto and made a part hereof.

2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each of the proposed units with each tract sharing in unit production on a surface acreage basis of participation.

3. Except to the extent contrary herewith, to extend to the proposed additional units all pertinent provisions of the order to be issued as a result of hearing to be held on November 18, 2008, under Docket No. 08-1786, and applicable statewide orders.

4. To consider such others matters as may be pertinent.

The Haynesville Zone, Reservoir A, in the Benson Field, insofar and only insofar as the HA RA SUB, HA RA SUC and HA RA SUD are concerned, is hereby defined as being the stratigraphic equivalent of that gas and condensate bearing formation encountered between the depths of 11,135 feet and 13,140 feet (electrical log measurements) in the Phillips Petroleum Company – Martin “B” No. 1 Well, located in Section 32, township 11 North, Range 10 West, Natchitoches Parish, Louisiana.

Any pertinent data, including well logs, not available at the Office of Conservation, may be obtained **AT THE COST OF THE REQUESTING PARTY** from Bill Dale with W. H. Robbins & Associates, L.L.C., 302 LaRue France, Lafayette, Louisiana 70508, Telephone Number (337)232-5004.

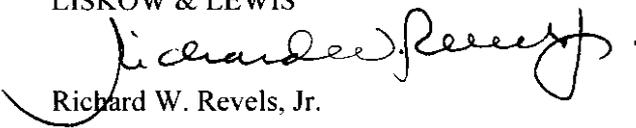
Pursuant to the Rules of Procedure, pre-application notice was given; however, no request for the conference was received. Therefore, the conference tentatively scheduled for December 4, 2008, **WILL NOT BE HELD.**

Attached hereto and made a part hereof are plats outlining the applicant’s proposals and a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom a copy of this application is being mailed. Pursuant to the Revised Rules of Procedure, the 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 furnished to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed is our check in the amount of \$1,510.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

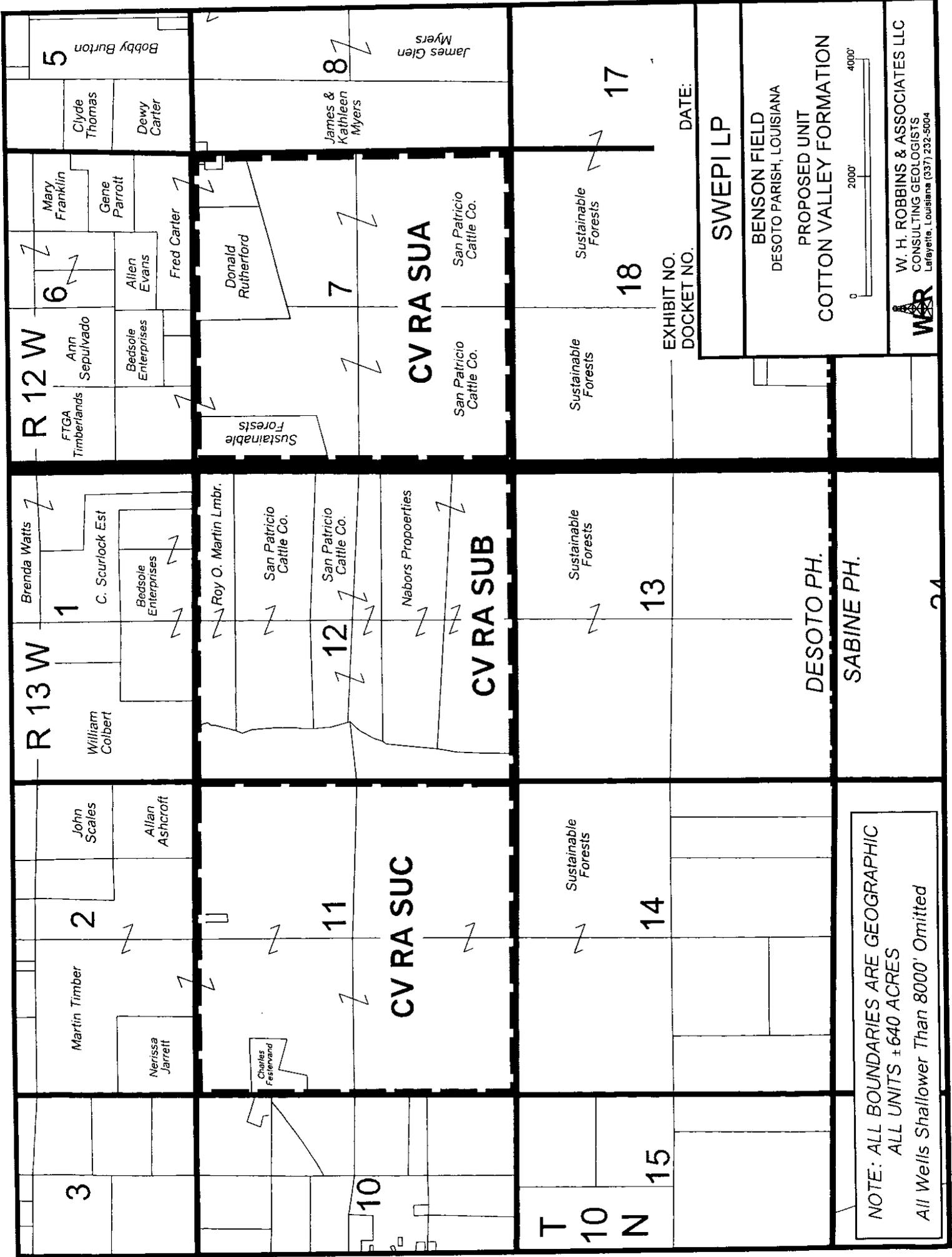
Sincerely,

LISKOW & LEWIS


Richard W. Revels, Jr.

RWRjr:dbf
Attachments

cc: Mr. James Broussard, Shreveport District Office of Conservation
cc: Interested Owners, Represented Parties and Interested Parties



R 12 W

R 13 W

T 10 N

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CV RA SUC

CV RA SUB

CV RA SUA

Sustainable Forests

Sustainable Forests

Sustainable Forests

Sustainable Forests

EXHIBIT NO.
DOCKET NO.

DATE:

SWEPI LP

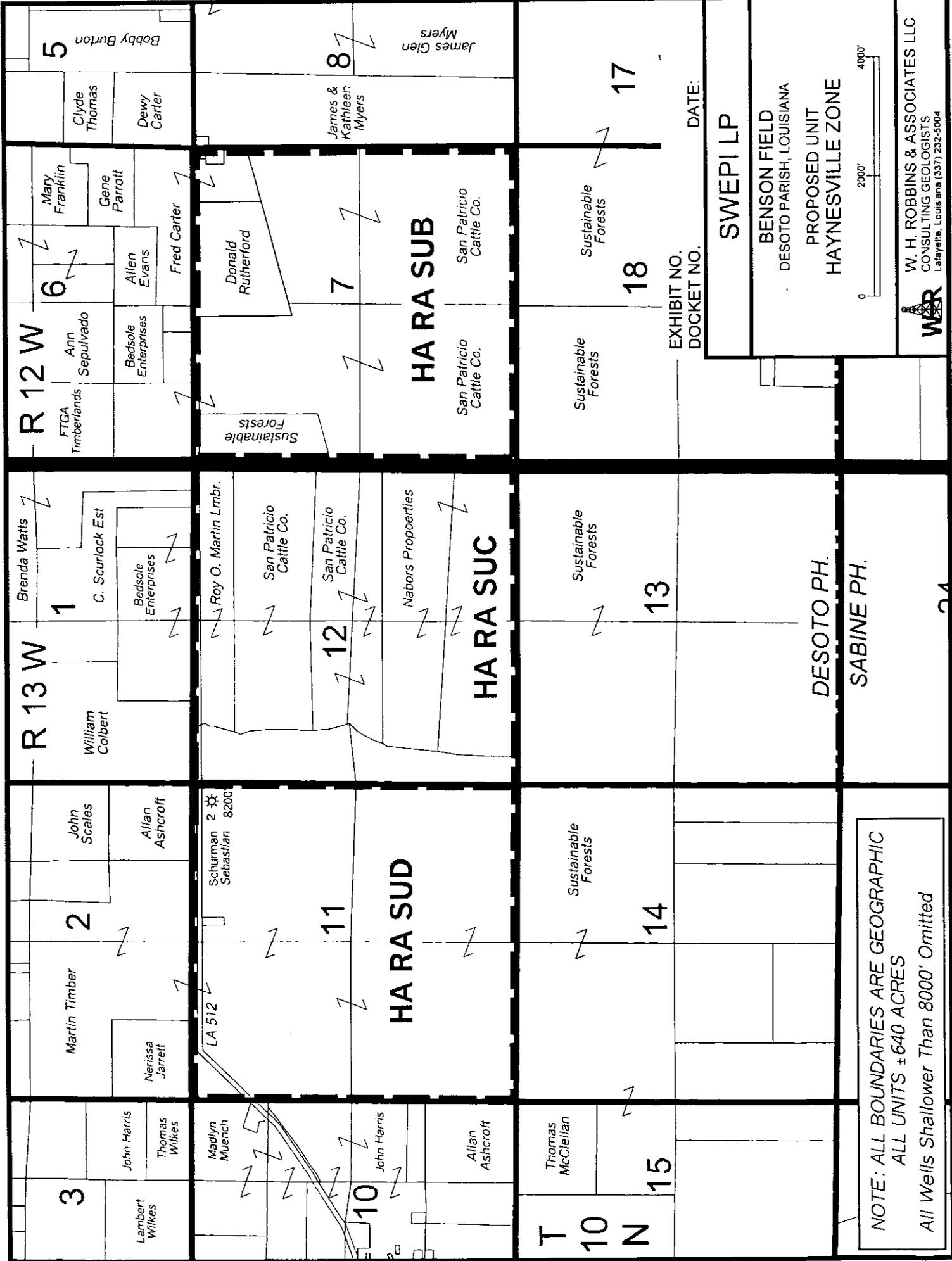
BENSON FIELD
DESOTO PARISH, LOUISIANA
PROPOSED UNIT
COTTON VALLEY FORMATION



NOTE: ALL BOUNDARIES ARE GEOGRAPHIC
ALL UNITS ±640 ACRES
All Wells Shallower Than 8000' Omitted

W. H. ROBBINS & ASSOCIATES LLC
CONSULTING GEOLOGISTS
Lafayette, Louisiana (337) 232-5004





R 12 W

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HA RA SUB

HA RA SUC

HA RA SUD

DESOTO PH.

SABINE PH.

FTGA Timberlands
Ann Sepulvado
Mary Franklin
Gene Parrott
Bedsole Enterprises
Allen Evans
Fred Carter
Clyde Thomas
Dewy Carter
Bobby Burton

Sustainable Forests
Donald Rutherford
San Patricio Cattle Co.
San Patricio Cattle Co.
San Patricio Cattle Co.
James Glen Myers
James & Kathleen Myers

William Colbert
Brenda Watts
C. Scurlock Est
Bedsole Enterprises
Roy O. Martin Lmbr.
San Patricio Cattle Co.
San Patricio Cattle Co.
Nabors Propperties

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Sustainable Forests
Sustainable Forests

Martin Timber
John Scales
Allan Ashcroft
Nerissa Jarrett
John Harris
Thomas Wilkes
LA 512
Schurman Sebastian 8200'

John Harris
Allan Ashcroft

Lambert Wilkes
John Harris
Thomas Wilkes
Madlyn Muench

Thomas McClellan

EXHIBIT NO.
DOCKET NO.

DATE:

SWEPI LP

BENSON FIELD
DESOTO PARISH, LOUISIANA
PROPOSED UNIT
HAYNESVILLE ZONE



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