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November 24, 2008

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.

Cotton Valley Formation, Reservoir A, and Bossier  
Zone of the Cotton Valley Formation, Reservoir A,  
CADDOPINE ISLAND FIELD, Caddo Parish,  
Louisiana.

Dear Sir:

WILCOX OPERATING CORPORATION ("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 Cotton Valley Formation, Reservoir A, and to the Bossier Zone of the Cotton Valley Formation, Reservoir A, in the Caddo-Pine Island Field, Caddo Parish, Louisiana:

1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of gas and condensate from the Bossier Zone of the Cotton Valley Formation, Reservoir A, such unit being shown on an attached plat and being designated BOS RA SUA.
2. To create one (1) additional drilling and production unit for the exploration for and production of gas and condensate from the Cotton Valley Formation, Reservoir A, such unit being shown on an attached plat and being designated CV RA SUU.
3. 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.
4. To designate Applicant as operator of, and its Hall-Hargraves No. 1 Well, located as shown on an attached plat, as the unit well for CV RA SUU.
5. To propose that future wells drilled to the Bossier Zone of the Cotton Valley Formation, Reservoir A, within or outside of the unit proposed herein, be located no closer than 330 feet to any unit line and no closer than 660 feet to any well completed in, drilling to, or for which a permit has been granted to drill to the Bossier Zone of the Cotton Valley Formation, Reservoir A.
6. To redefine the Cotton Valley Formation, Reservoir A, insofar and only insofar as to the proposed additional unit shown on an attached plat, as being that interval encountered between the measured depths of 6,792 feet and 8,390 feet in the Texaco, Inc.--D L Gish et al No. 1 Well, located in Section 23, Township 20 North, Range 15 West, Caddo Parish, Louisiana, and being further defined as that interval encountered between the measured depths of 7,119 feet and 8,835 feet in the Wilcox Operating Corporation--Hall-Hargraves No. 1 Well, located in Section 11, Township 20 North, Range 16 West, Caddo Parish, Louisiana.

7. To define the Bossier Zone of the Cotton Valley Formation, Reservoir A, as that interval encountered between the measured depths of 8,390 feet and 9,500 feet in the Texaco, Inc.--D L Gish et al No. 1 Well, located in Section 23, Township 20 North, Range 15 West, Caddo Parish, Louisiana.

8. To extend, except as in conflict herewith, the provisions of Office of Conservation Order No. 122-M, effective January 1, 1977, to the proposed additional unit for the Cotton Valley Formation, Reservoir A.

9. To discuss such other matters as may be pertinent to any of these proposals.

The Cotton Valley Formation, Reservoir A, in the Caddo-Pine Island Field, Caddo Parish, Louisiana, was initially defined in Office of Conservation Order No. 122-M, effective January 1, 1977.

Pertinent data concerning this application will be available for inspection at the offices of Joe B. Adams, 21010 Vermont Street, Livingston, Louisiana 70754. Any person wishing to inspect 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.

By letter dated October 27, 2008, Applicant gave notice, in accordance with the Revised Rules of Procedure, of its intention to apply for a public hearing concerning these proposals and a pre-application conference with respect to Applicant's proposals was thereafter held beginning at 2:30 o'clock p.m. on November 20, 2008, in Shreveport, Louisiana. Attached is a list of the names and addresses of those persons present at the conference.

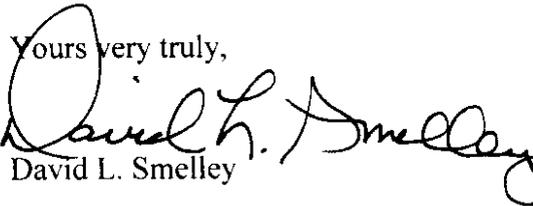
The purpose of the conference was explained as well as the bases for Applicant's proposals by sufficient data and detail for those present at the conference to have a reasonable opportunity to discuss the proposals and attempt to resolve any differences in good faith. Following this presentation there was a general question and answer period concerning the proposals of Applicant, during which an objection was expressed by Mr. Tim Allen, on behalf of Gemini Exploration, Inc., as to the proposals relating to the Bossier Zone of the Cotton Valley Formation, and particularly to designation of the Bossier Zone as part of the Cotton Valley Formation. The objection could not be amicably resolved, and Mr. Allen indicated that Gemini may file a counterplan to the proposals of Applicant. Thereafter the conference was adjourned.

Pursuant to the Revised 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 each of the unit plats (which are identical to the unit plats attached to the pre-application notice) is enclosed herewith, and a copy of this letter and 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.

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Applicant will provide for posting of a copy of the Legal Notice of this hearing, and of 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 Caddo-Pine Island 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.

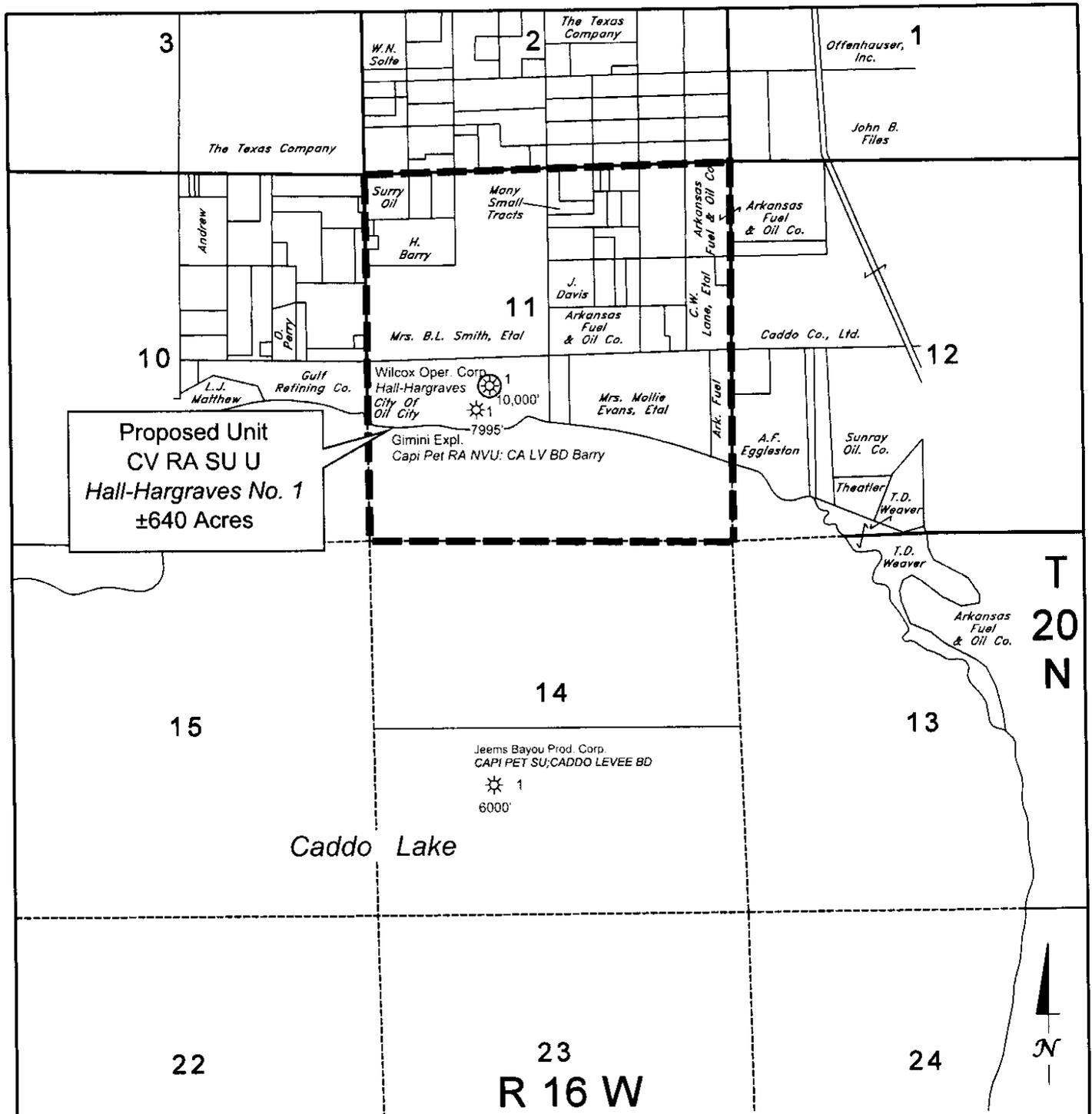
Finally, enclosed herewith is our check payable to the Office of Conservation covering the application fee.

Yours very truly,  
  
David L. Smelley

-- Attorney for Wilcox Operating Corporation

DLS:dp  
Enclosures

cc: Mr. James C. Broussard (w/encls.)  
Mr. Mark Preddy (w/encls.)  
Mr. Joe Adams (w/encls.)  
Interested Owners, Represented Parties  
and Interested Parties (w/plats only)

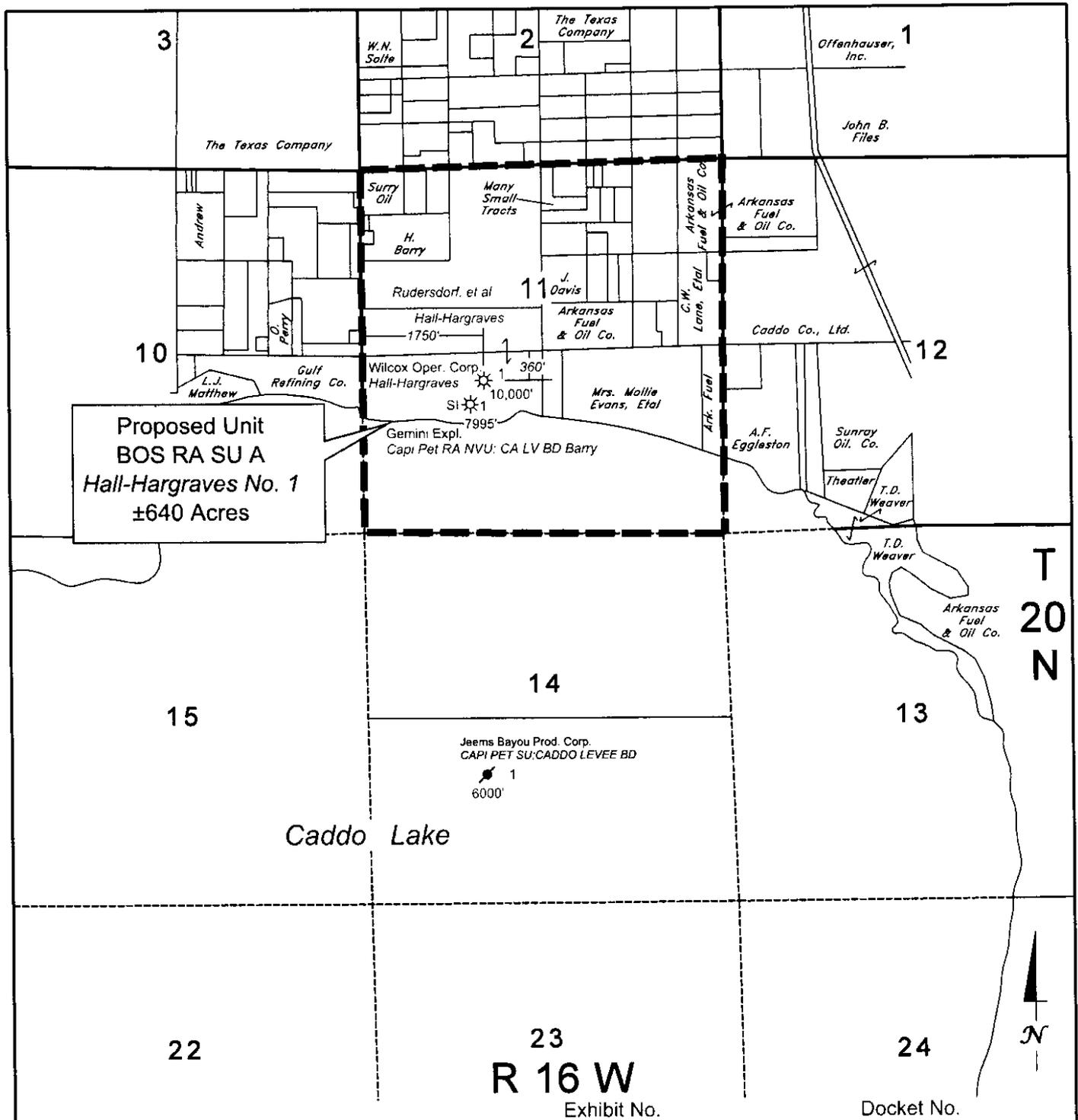


**Proposed Unit**  
**CV RA SU U**  
**Hall-Hargraves No. 1**  
**±640 Acres**

--- = PROPOSED UNIT  
 ○ = Proposed Unit Well

Note: All unit boundaries are geographic.  
 Wells less than 6000' deep are not shown.

Exhibit No.	Docket No.
<b>Wilcox Operating Corporation</b>	
<b>CADDO PINE ISLAND FIELD</b> CADDO PARISH, LOUISIANA	
<b>PROPOSED COTTON VALLEY SAND UNIT</b> CV RA SU U	
Date:	
Geology: Joe B. Adams	



Proposed Unit  
 BOS RA SU A  
 Hall-Hargraves No. 1  
 ±640 Acres

--- = PROPOSED UNIT

Note: All unit boundaries are geographic.  
 Wells less than 6000' deep are not shown.



Exhibit No.	Docket No.
<b>Wilcox Operating Corporation</b>	
<b>CADDO PINE ISLAND FIELD</b>	
<b>CADDO PARISH, LOUISIANA</b>	
<b>PROPOSED BOSSIER ZONE</b> of the Cotton Valley Formation	
Date:	
Geology: Joe B. Adams	