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September 21, 2010

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 Davis Zone, Reservoir A, UNIONVILLE FIELD, Lincoln Parish, Louisiana.

Dear Sir:

WILL-DRILL OPERATING, L.L.C. ("Applicant"), hereby respectfully applies for a public hearing to consider evidence relative to the issuance of an Order pertaining to the following matters relating to the Cotton Valley Davis Zone, Reservoir A, in the Unionville Field, Lincoln Parish, Louisiana:

1. To redefine the Cotton Valley Davis Zone, Reservoir A, in the Unionville Field, insofar and only insofar as to the existing unit CV DAVIS RA SU77, said unit being shown on the attached plat, as that gas and condensate bearing interval encountered between the depths of 8500 feet and 9428 feet (electrical log measurements) in the Will-Drill Operating LLC--Aswell No. 1 Well, located in Section 12, Township 19 North, Range 1 West, Lincoln Parish, Louisiana.

2. To confirm the unit designated CV DAVIS RA SU77 as remaining in full force and effect as a drilling and production unit for the exploration for and production of gas and condensate from the Cotton Valley Davis Zone, Reservoir A, in the Unionville Field, as redefined in the manner set forth above.

3. To confirm Applicant as operator of, and its Aswell No. 1 Well as the unit well for, CV DAVIS RA SU77.

4. To continue in full force and effect, except to the extent contrary herewith, the provisions of Office of Conservation Order No. 206-E, effective December 13, 1978, as amended and supplemented by the Order No. 206-E series of Orders, and of all applicable Statewide Orders, to the unit CV DAVIS RA SU77.

5. To discuss such other matters as may be pertinent.

The Cotton Valley Davis Zone, Reservoir A, in the Unionville Field, was defined in Order No. 206-E-35, effective December 14, 1993, and was redefined as to CV DAVIS RA SU77 in Order No. 206-E-73, effective May 25, 2010.

Any pertinent data concerning this application will be available for inspection at the offices of Will-Drill Operating, L.L.C., 416 Travis Street, Suite 1200, Shreveport, Louisiana 71101-3194. Any person wishing to inspect any such data should call Mr. Zach McDonald at (318) 222-7464 during normal business hours in order to arrange a date and time for such inspection. A copy of any such data which is not otherwise available at the Office of Conservation can be obtained from Applicant at the expense of the requesting party.

By letter dated September 8, 2010, 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 to discuss the proposals was tentatively scheduled for September 30, 2010. No conference request was received within the delays provided for in the Rules of Procedure; therefore the conference will not be held.

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 the unit plat is enclosed herewith, and a copy of this letter and of the attached plat 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 of the enclosed plat, 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 Unionville 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 Will-Drill Operating, L.L.C.

DLS:dp
Enclosures
cc: Mr. James C. Broussard (w/encls.)
Mr. Kem Hargrove (w/encls.)
Mr. Zach McDonald (w/encls.)
Interested Owners, Represented Parties
and Interested Parties (w/plat only)

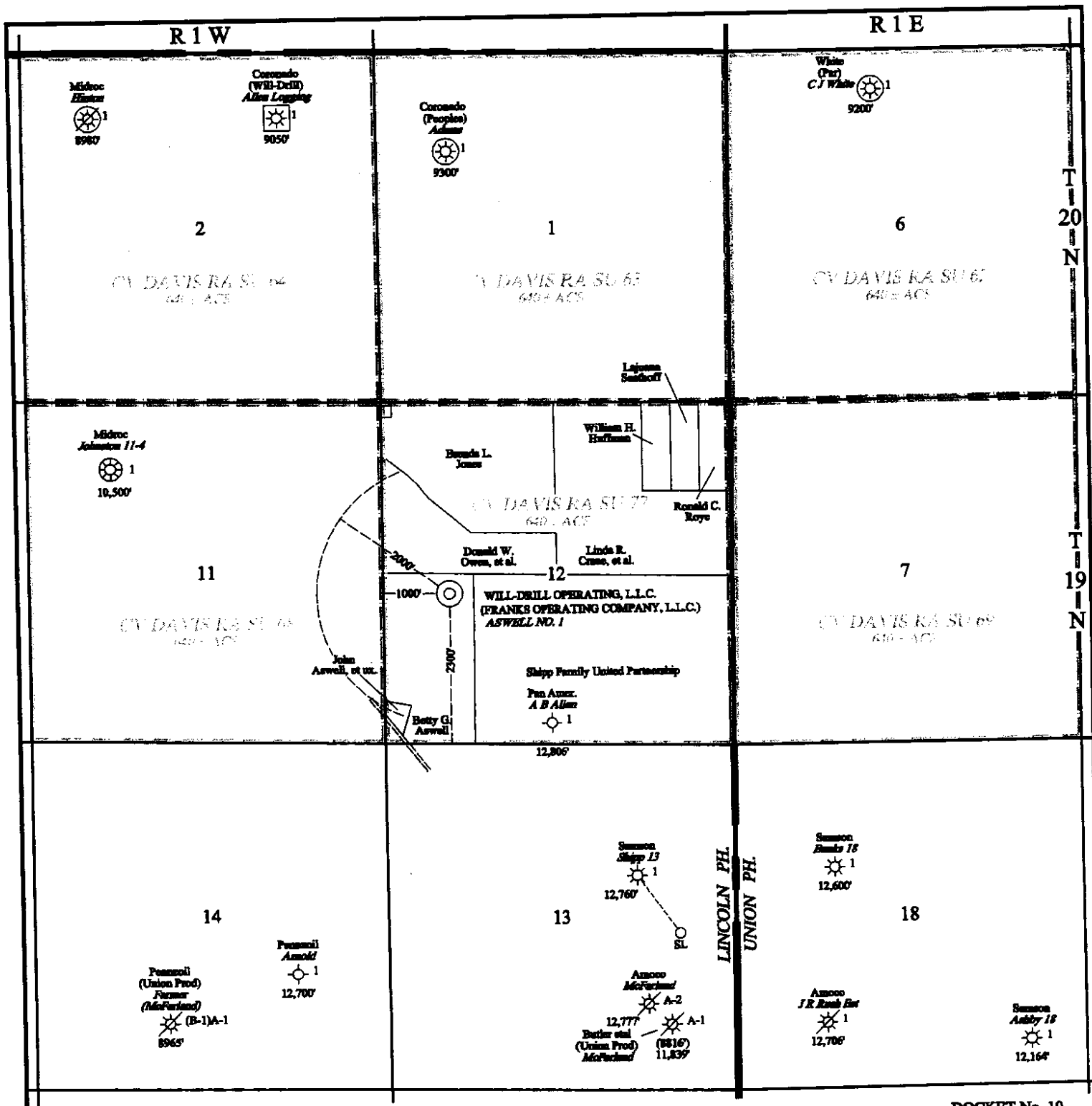

EXHIBIT No. 1

DOCKET No. 10-

WILL-DRILL OPERATING, L.L.C.

SHREVEPORT, LOUISIANA

UNIONVILLE FIELD

Lincoln Ph., Louisiana

PROPOSED REDEFINITION OF COTTON VALLEY DAVIS ZONE, RESERVOIR A,

AS TO COTTON VALLEY DAVIS ZONE, RESERVOIR A, SAND UNIT 77

:EXISTING UNIT WELLS

:EXISTING SUBSTITUTE UNIT WELL

:EXISTING CV DAVIS SAND UNITS