

LISKOW & LEWIS

A Professional Law Corporation

822 Harding Street
Post Office Box 52008
Lafayette, LA 70505
(337) 232-7424 Main
(337) 267-2399 Fax

One Shell Square
701 Poydras Street, Suite 5000
New Orleans, LA 70139
(504) 581-7979 Main
(504) 556-4108 Fax

First City Tower
1001 Fannin Street, Suite 1800
Houston, TX 77002
(713) 651-2900 Main
(713) 651-2908 Fax

www.Liskow.com

January 27, 2010

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: Oligocene Zone, Reservoir A
North Elton Field
Allen Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **WILL-DRILL OPERATING, L.L.C.** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters:

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 Oligocene Zone, Reservoir A, in the North Elton Field, Allen Parish, Louisiana, said unit to be designated OLIG RA SUA, 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 the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
3. To designate Will-Drill Operating, L.L.C. as operator of the proposed unit.
4. To designate its Vit et al 23 No. 1 Well as unit well for the proposed unit.
5. To provide that any wells drilled to the Oligocene Zone, Reservoir A, within or outside the unit created herein, should be located in accordance with the provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
6. To provide that the Commissioner of Conservation should be authorized to reclassify the aforementioned zone and reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of such reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
7. To consider such others matters as may be pertinent.

The Oligocene Zone, Reservoir A, in North Elton Field, is hereby defined as being that gas and condensate bearing zone encountered between the depths of 6,219 feet and 7,866 feet (electrical log measurements) in the Will-Drill Operating, L.L.C. – Vit et al 23 No. 1 Well, located in Section 23, Township 6 South, Range 3 West, Allen Parish, Louisiana.

Any pertinent data, including well logs, not available from the Office of Conservation, may be obtained **AT THE COST OF THE REQUESTING PARTY** from W. H. Robbins & Associates, 302 LaRue France, Lafayette, LA 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 February 5, 2010, **WILL NOT BE HELD**. Note that a correction has been made in the applicant's name since the filing of the pre-application notice.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal along with 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, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette 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 \$755.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,

LISKOW & LEWIS


Richard W. Revels, Jr.

RWRjr/dbf
Enclosures

cc: Mr. Richard Hudson, Lafayette District Office of Conservation
cc: Interested Owners, Represented Parties and Interested Parties

R 3 W

NEWITT BEL 9200'

18

17

19

Bel Mineral, LLC

Bel Mineral, LLC

Bel Mineral, LLC

BEL OIL BEL 3603'

BEL OIL JONES 7604'

Olig RA SUA VIT 23 No. 1 ± 605 ACRES

BRAMMER 7500'

Elmer V. Alcock, Jr., et al

Aubrey J. Brown, et al

T 6 S

BEL OIL BEL 10315'

JONES 8255'

WHISKEY BAY DEROUEN 8600'

BROOKLYN BEL 15000'

LLOYD SMITH REES

BEL HUBER 8650'

22

23

GENERAL MIN. LEDOUX 8615'

BEL OIL BEL 7654'

PAN AM JENKINS 8256'

BEL REED 8930'

WILL-DRILL VIT 23

James H. Jenkins, et al

BURTON FINE FARMS 8035'

SANCHEZ-O'BRIEN 10590'

Jack G. Jenkins

DeRouen Farms, Inc.

Kenneth Ray Kennedy, et al

Beuchhans Timberland, LLC

Linda Rees Carrier

PAN AM JENKINS 7760'

Constance Loretta K. Waters

Richard Bertrand et al

Dan C. Waters

James H. Jenkins, et al

BEL LANGLEY

BEL REES 10640'

Richard Eugene Stepanow, Sr., et al

Richard Bertrand et al

BEL OIL BEL 8017'

Jack G. Jenkins

Jack G. Jenkins

BEL OIL BEL 8017'

Richard Eugene Stepanow, Sr., et al

Richard Eugene Stepanow, Sr., et al

Bel Mineral, LLC

Bel Mineral, LLC

Bel Mineral, LLC

21

30

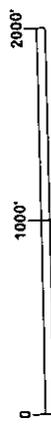
31

EXHIBIT NO. DOCKET NO. DATE:

WILL-DRILL OPERATING, L.L.C.

NORTH ELTON FIELD ALLEN PARISH, LOUISIANA

PROPOSED UNIT OLIGOCENE ZONE



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



NOTE: ALL BOUNDARIES ARE GEOGRAPHIC AND COINCIDENT WITH ORDER No. 166-B