

 **GOODRICH**
PETROLEUM CORPORATION

801 Louisiana, Suite 700
Houston, Texas 77002
(713) 780-9494
Fax (832) 399-3213

January 19, 2011

Honorable James H. Welsh
Commissioner of Conservation
Louisiana Office of Conservation
PO Box 94275
Baton Rouge, LA 70804-9275

2011 JAN 27 AM 9:08
OFFICE OF CONSERVATION
PRODUCTION AUDIT SECTION

Re: Application for Hearing and Authority to Commingle Onshore Liquid Production by Well Test
Goodrich Petroleum Company (G104)
SND Energy, LLC (S405)
Bethany-Longstreet Field
Bethany-Longstreet Commingling Facility No. 25 (910390)
DeSoto and Caddo Parishes, Louisiana

Dear Commissioner Welsh,

SND Energy, LLC is now the operator of Bethany-Longstreet Commingling Facility No. 25 (910390). They accept, acknowledge and agree to proceed with the application that was made on behalf of Goodrich Petroleum Company (Goodrich), for Hearing and Authority to Commingle Onshore Liquid Production by Well Test.

Sincerely,



Shelley Copeland
Regulatory Analyst
Goodrich Petroleum Company



Bob Anderson
Senior Vice President
SND Energy Company, Inc.
Office: 214-691-3072 Ext. 227

2011 JAN 27 PM 5:00

19345 Point O Woods Court
Baton Rouge, Louisiana 70809
225-753-4723
225-753-4661 (fax)

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Energy Resource Development, Inc.

September 23, 2010

Mr. James Magee
Louisiana Office of Conservation
PO Box 94275
Baton Rouge, LA 70804-9275

RE: **Fifth Revision to Application for Hearing and Authority to Commingle Onshore Liquid Production**
Goodrich Petroleum Company
Bethany-Longstreet Commingling Facility No. 25 (910390)
CV RA SU70, CV RA SU90, CV RA SU103, and **HA RA SUG**
Bethany Longstreet Field
DeSoto and Caddo Parishes, Louisiana

Dear Mr. Magee,

Application was made on behalf of Goodrich Petroleum Company (Goodrich), pursuant to Statewide Order 29-D-1 for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an Order approving the commingling of onshore liquid hydrocarbon production by well test at the Bethany Longstreet Commingling Facility No. 25, Bethany Longstreet Field, DeSoto and Caddo Parishes, Louisiana. By this Application, Goodrich proposed to commingle liquid hydrocarbons from various units, as illustrated on the attached Exhibit A, in the Bethany Longstreet Commingling Facility No. 25. The facility currently uses well test for measurement and allocation, as approved by Order No. 289-54. The Application was for approval to commingle by well test, pursuant to Section 1505.2 (Well Tests) of Statewide Order 29-D-1 for the CV RA SU70, CV RA SU90, CV RA SU103. A third revision was submitted, on October 23, 2009, to amend the commingling schematic to illustrate three phase separators and to remove the prior request for commingling of HOSS RA SU63, HA RA SU64, 65 70, 71, AND 72. The fourth revision was submitted to remove the reference to alternate test methods, at the request of Todd Keating. **This revision is to add the HA RA SUG; Clarence Brown No. 1 (LUW 615307) to the referenced commingling facility.**

Goodrich currently commingles all of their Cotton Valley and Hosston dual completed wells in the subject field by well test for saltwater and condensate/oil. These wells make a minimal volume of condensate and many wells produce none at all. This application proposes to allocate liquid hydrocarbons by periodic well test for three additional units. The commingling of the gas will remain the same. The existing three phase separators would be utilized as two phase separators, and there will be tanks at each site for measuring produced fluids. The condensate and water rate will be determined by isolating each stream in a tank and gauging condensate and water production.

Goodrich requests that it be authorized to commingle and allocate liquid hydrocarbon production based upon monthly well tests of each well in compliance with the provisions of Statewide Order 29-D-1. Goodrich requests authority to commingle production for delivery to Plains LP by tank truck. The saltwater will be stored, transported by tank truck, and disposed of by deep well injection.

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Unless otherwise indicated below, this Application is made pursuant and subject to certain Unitization Orders which have been duly entered to equitably allocate production among the interested parties hereto, with the units formed there under and the wells from which said units are produced as listed in attached Exhibit "A".

The units and leases proposed for commingled production into the Bethany Longstreet Commingling Facility No. 25 are listed in the attached Exhibit "A".

Additionally, enclosed herewith are the following:

1. A detailed narrative explanation of the flow of liquid hydrocarbons and produced water through the facility, the procedures for testing and measurement of the volumes of liquid hydrocarbons from each well flowing into the facility via well test, the method of measuring liquid hydrocarbons and produced water processed through the facility, the frequency of inspections or calibration of the procedures and devices to be used to measure liquid hydrocarbon and produced water volumes for equitable allocation, and, the formulas to be utilized to calculate equitable allocation of liquid hydrocarbons and water volumes therefrom;
2. A detailed schematic flow diagram of the mechanical facilities to be used for commingling, including specific measurement locations to be used for allocation purposes;
3. A list of Interested Parties, **was previously submitted with the initial application.**
4. The application fee of \$ 755.00, **was previously submitted with the initial application.**

By this Application, Goodrich, as the owner and operator of the proposed Bethany Longstreet Commingling Facility No. 25, proposes commingling authority pursuant to order to add production from the captioned units and leases into said Facility to accomplish commingling by allocation by well test of onshore liquid hydrocarbon production there from in the manner set forth in the detailed narrative facility description attached hereto, and with reference to and as shown on the detailed schematic flow diagram of the existing commingling facility attached hereto, per this proposal.

The applicable authority will be covered pursuant to Title 43, Part XIX, Subpart 6, Statewide Order No. 29-D-1. 1505.2 (Well Test).

Therefore, Goodrich requests that this application be set for hearing at the earliest date available for docketing. Further, Goodrich requests that a copy of said legal notice be forward to Goodrich through signed consultant for posting, advertising, and mailing to all parties on the Interested Parties list, to be proved by and affidavit of mailing submitted to the Office of Conservation

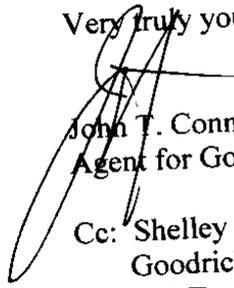
It is the opinion of Goodrich that the commingling of liquid hydrocarbon production and the use of well test for allocation of production in the manner proposed herein will provide reasonably accurate measurement, will not create inequities, and will afford the owner of any interest therein the opportunity to recover his just and equitable share of production or revenues accruing from the units and leases under consideration.

A reasonable effort was made to ascertain the names and addresses of all Interested Parties. A copy of this application has been mailed to the District Manager of the Shreveport, Office of Conservation. Upon receipt of the Legal Notice, the Applicant will mail a copy of same to all Interested Parties in accordance with Statewide Order 29-D-1, and forward to you the required affidavit of mailing. A copy of the interested party list in this matter can be obtained by contacting the undersigned at the following address.

All inquiries concerning this proposal should be directed to John T. Connolly, Agent for Goodrich Petroleum Company, 19345 Point O Wood Court, Baton Rouge, Louisiana 70809.

Should you have any questions, please call or email me at 753-4723 / erdi@cox.net.

Very truly yours,



John T. Connolly
Agent for Goodrich Petroleum Company

Cc: Shelley Copeland
Goodrich Petroleum Company
808 Travis, Suite 1320
Houston, Texas 77002

Jim Broussard
District Manager
Office of Conservation
1525 Fairfield Avenue
Suite 668
Shreveport, LA 71101-4388

EXHIBIT A

LIST OF WELLS AND UNIT TO BE COMMINGLED

BETHANY LONGSTEET COMMINGLING FACILITY NO. 25

BETHANY LONGSTEET FIELD

DeSOTO AND CADDO PARISHES, LOUISIANA

GOODRICH PETROLEUM COMPANY
BETHANY-LONGSTRET COMMINGLING FACILITY NO. 25

UNITS CURRENTLY APPROVED FOR COMMINGLING

<u>UNIT NAME</u>	<u>LUW CODE</u>
HOSS RA SU7	615115
HOSS RA SU49	610313
HOSS RA SU52	614808
HOSS RA SU54	614990
HOSS RA SU61	614000
HOSS RA SU62	614039
HOSS RA SU72	614450
HOSS RA SU73	614547
HOSS RA SU77	614929
HOSS RA SU80	614837
HOSS RA SU86	614840
HOSS RA SU88	614897
HOSS RA SU89	615198
HOSS RA SU90	615220
HOSS RA SU97	615385
CV RA SU66	614719
CV RA SU67	614121
CV RA SU68	614101
CV RA SU73	614308
CV RA SU74	614363
CV RA SU78	614664
CV RA SU80	614807
CV RA SU89	615053
CV RA SU91	614928
CV RA SU92	614918
CV RA SU93	615070
CV RA SU95	615154
PET RA SU62	615086

UNITS CURRENTLY PROPOSED FOR COMMINGLING

<u>UNIT NAME</u>	<u>LUW CODE</u>
CV RA SU70	614169
CV RA SU90	615335
CV RA SU103	615327
HA RA SUG	615307

EXHIBIT B

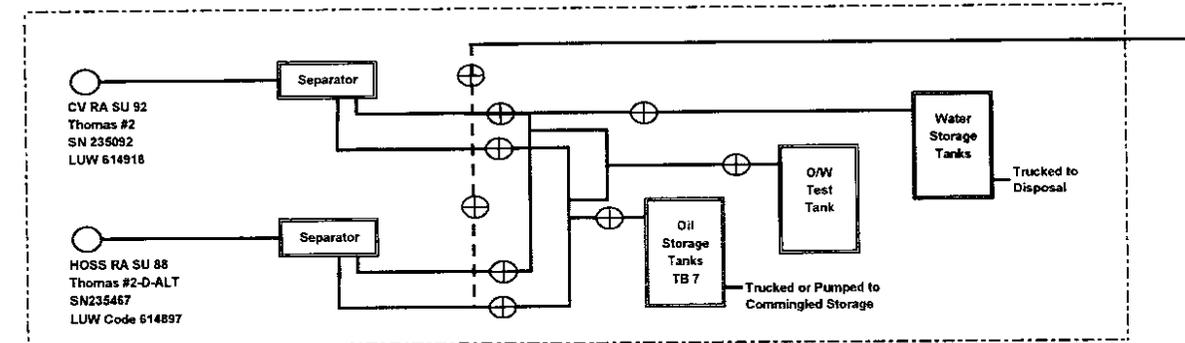
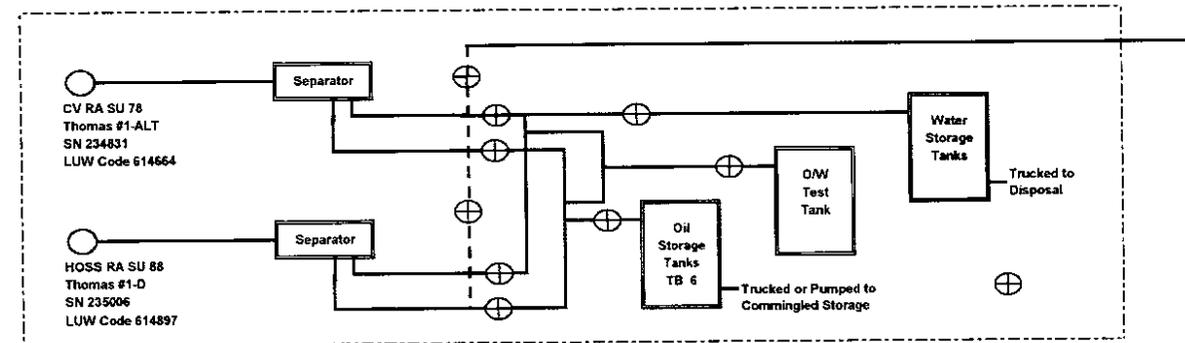
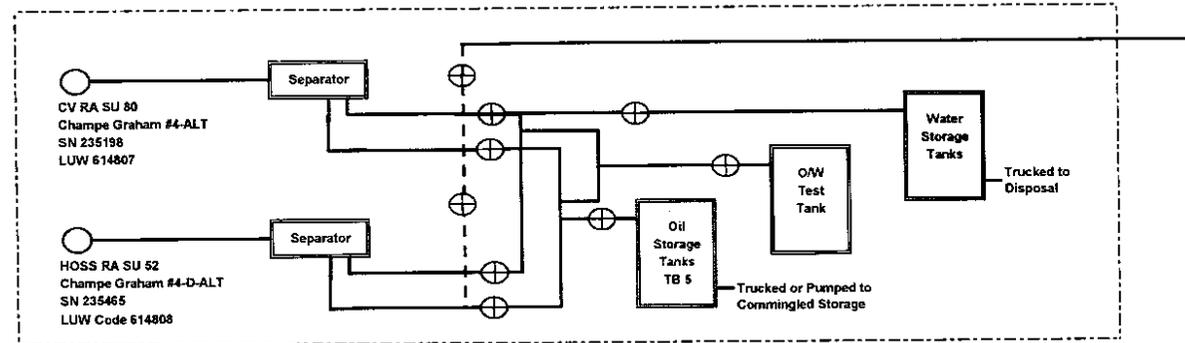
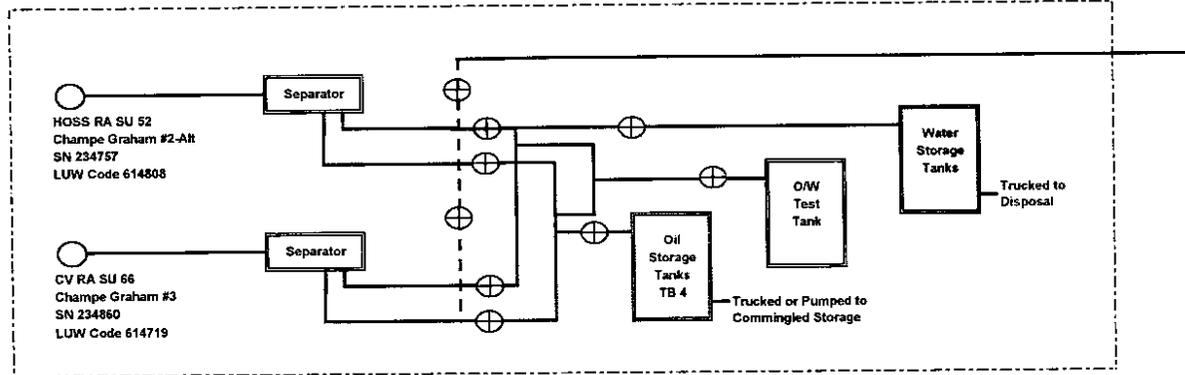
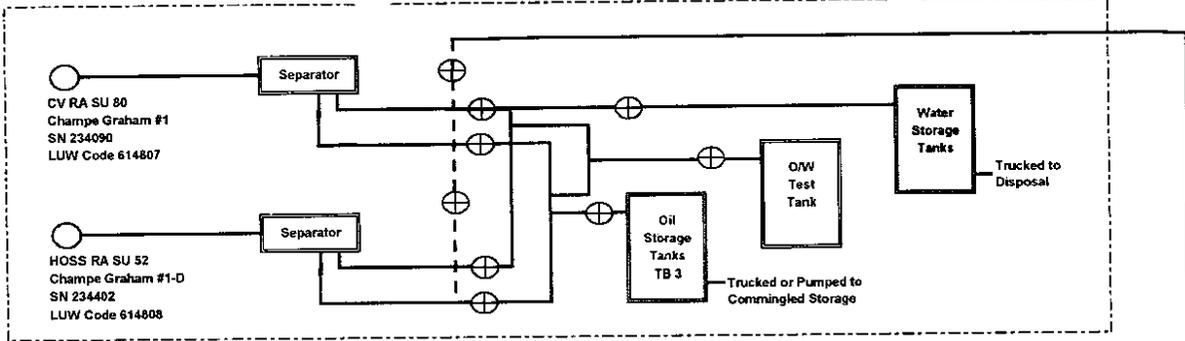
FLOW SCHEMATIC

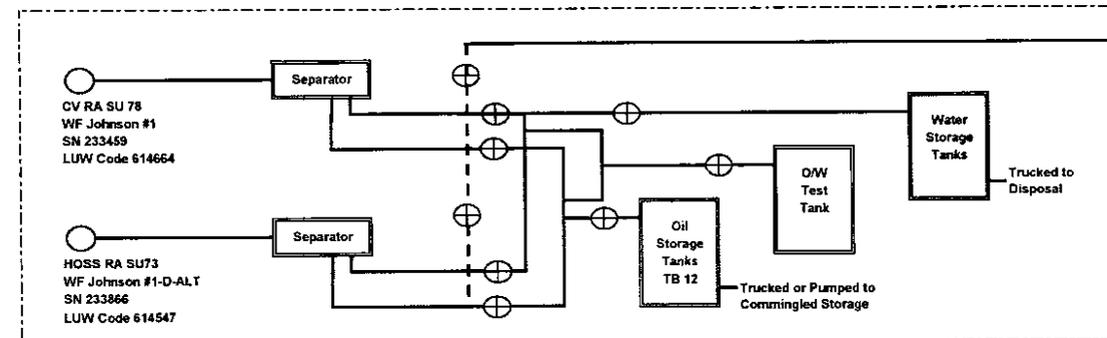
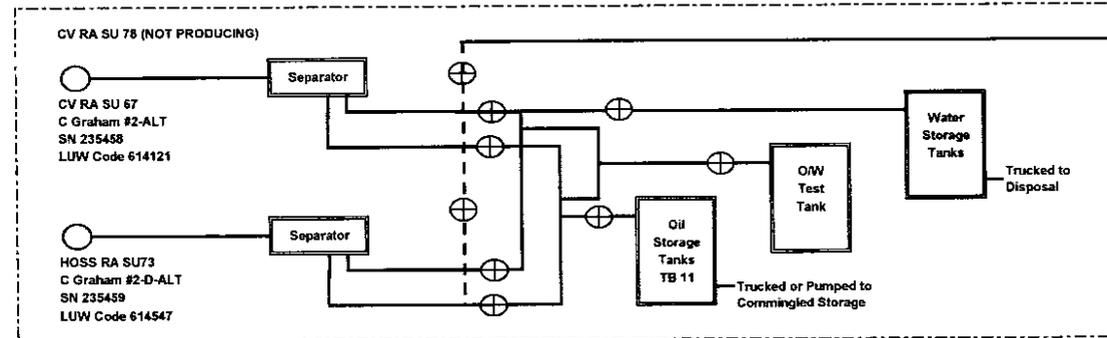
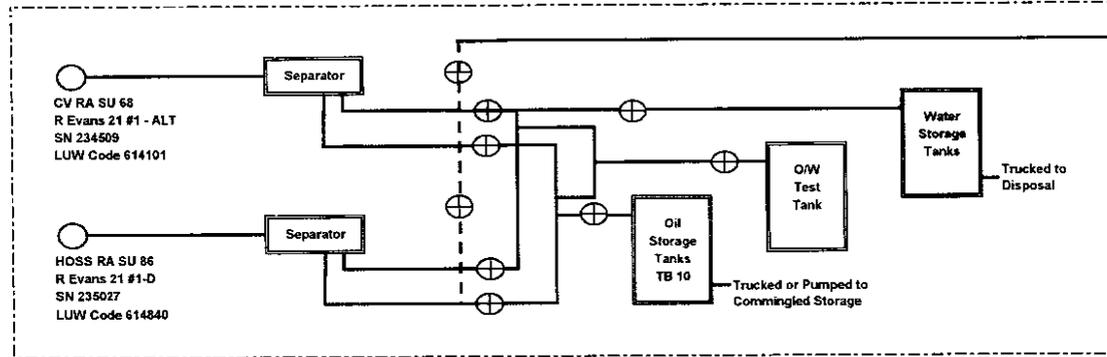
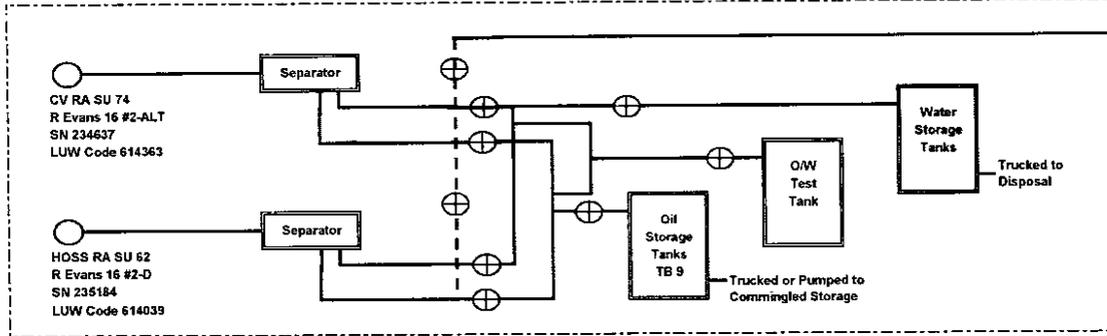
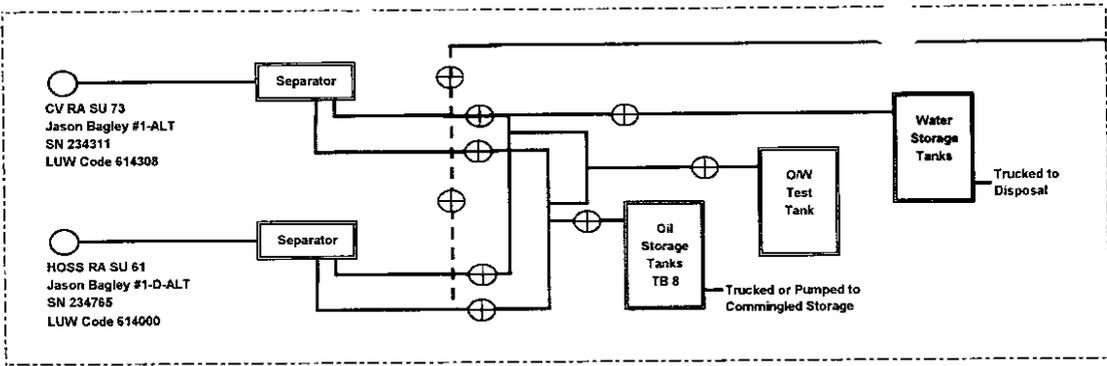
BETHANY LONGSTEET COMMINGLING FACILITY NO. 25

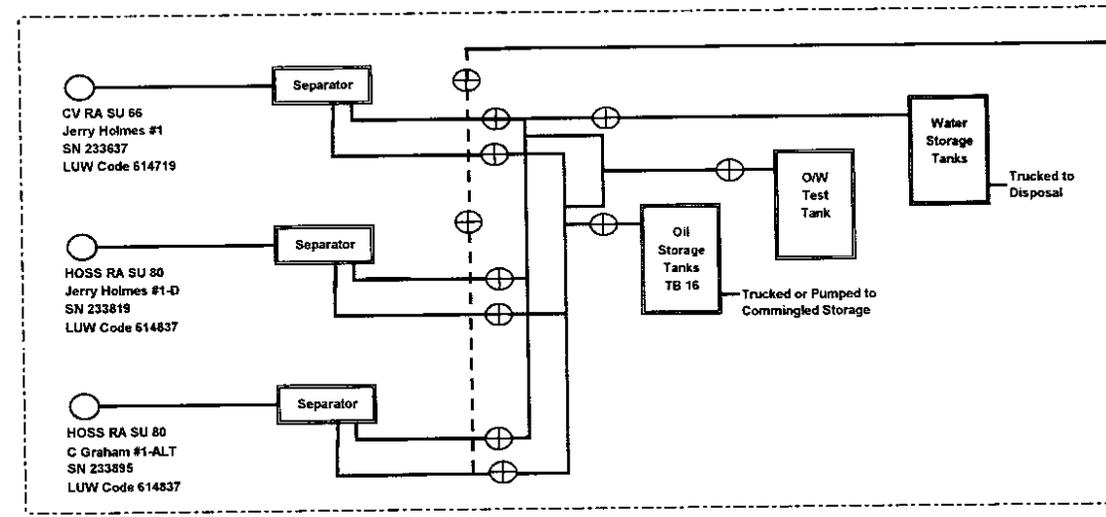
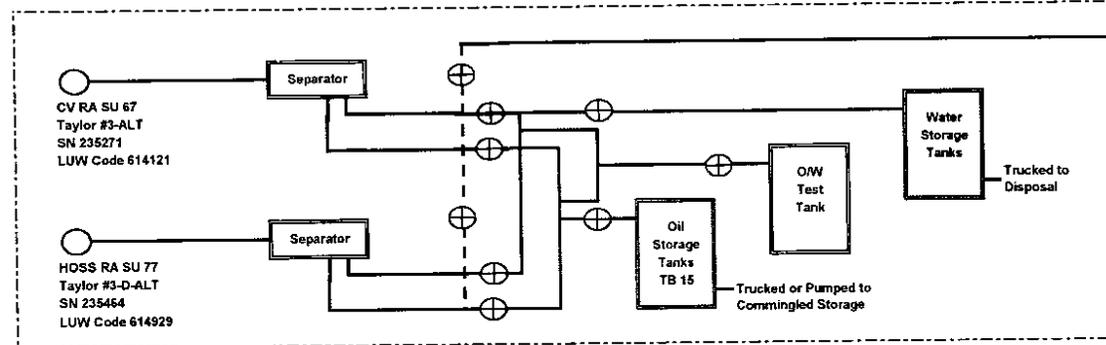
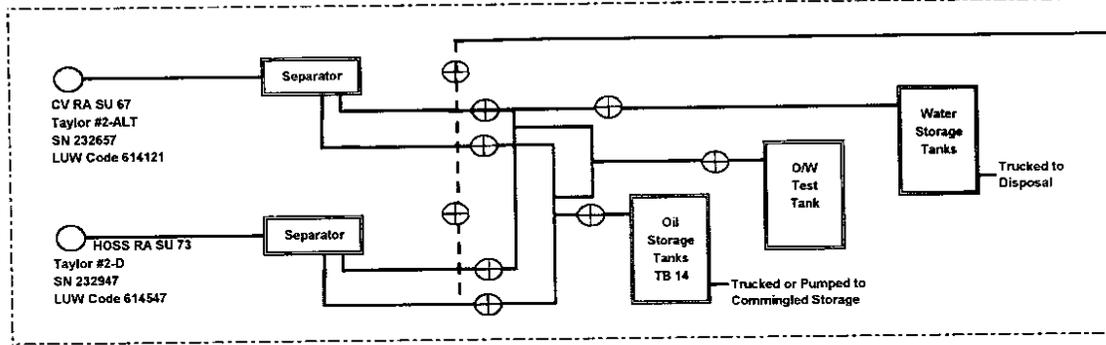
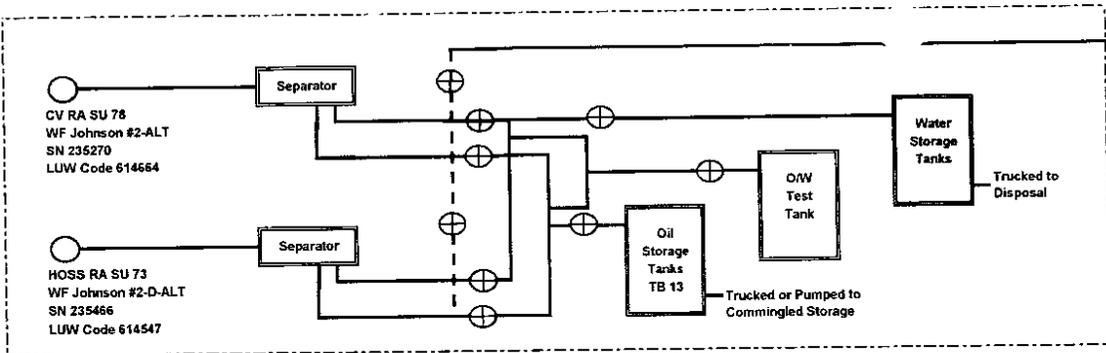
BETHANY LONGSTEET FIELD

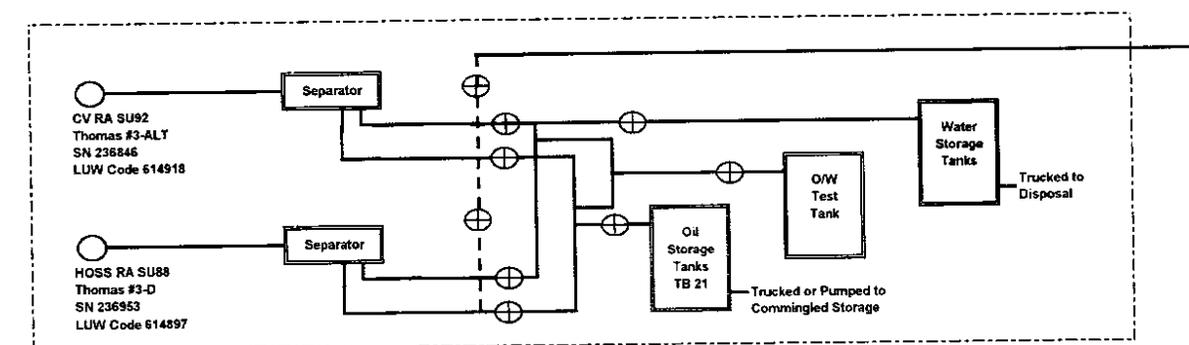
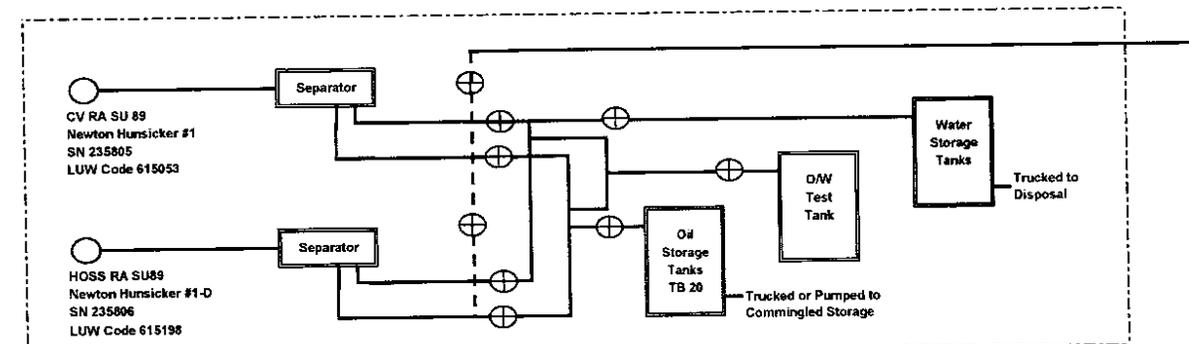
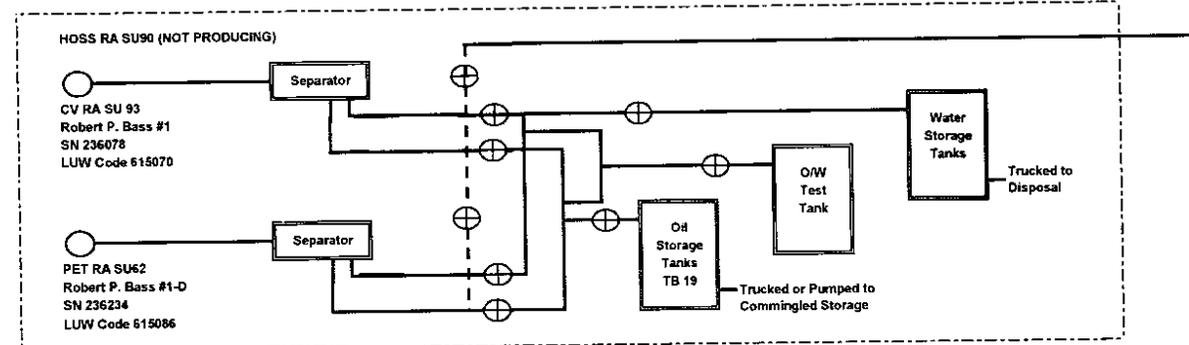
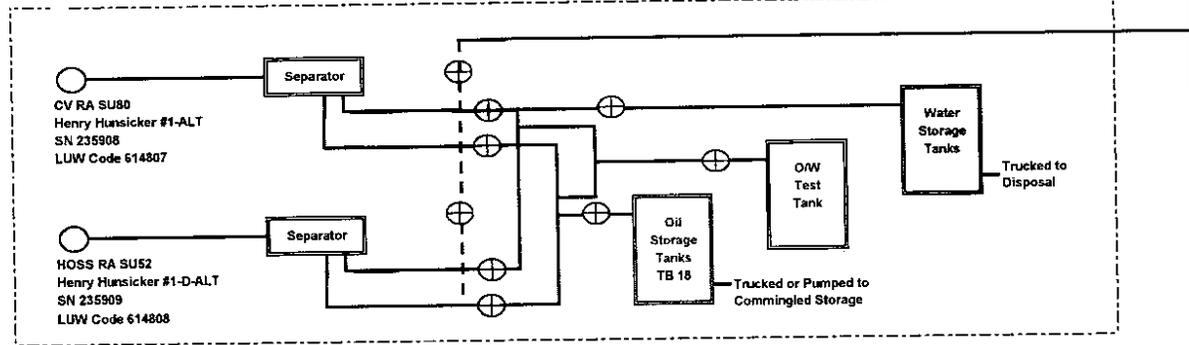
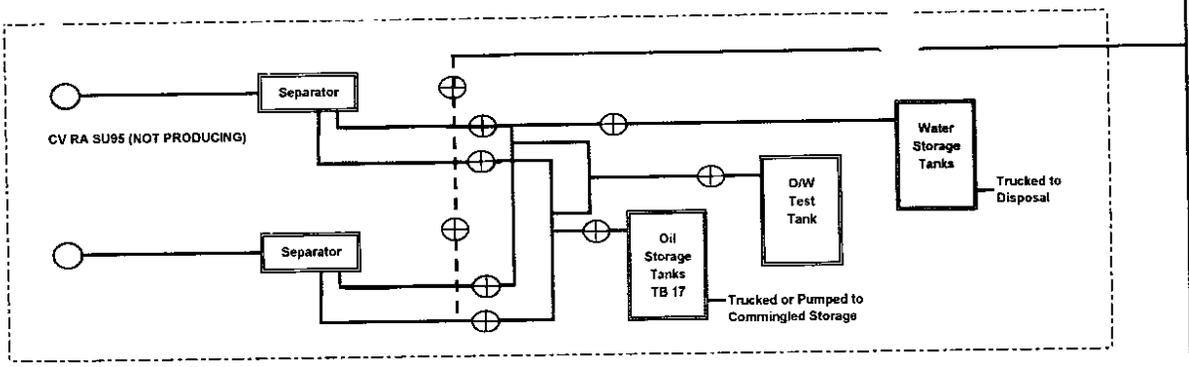
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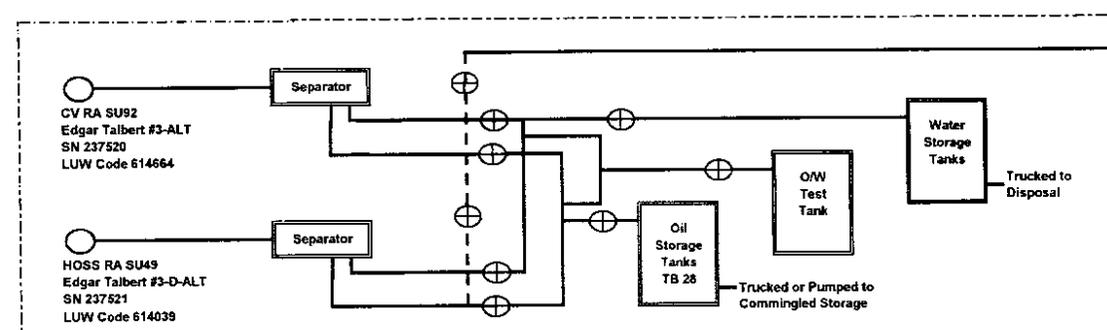
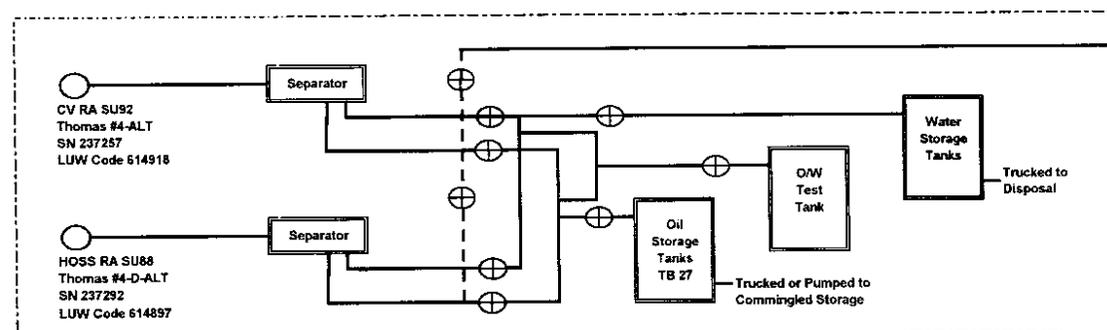
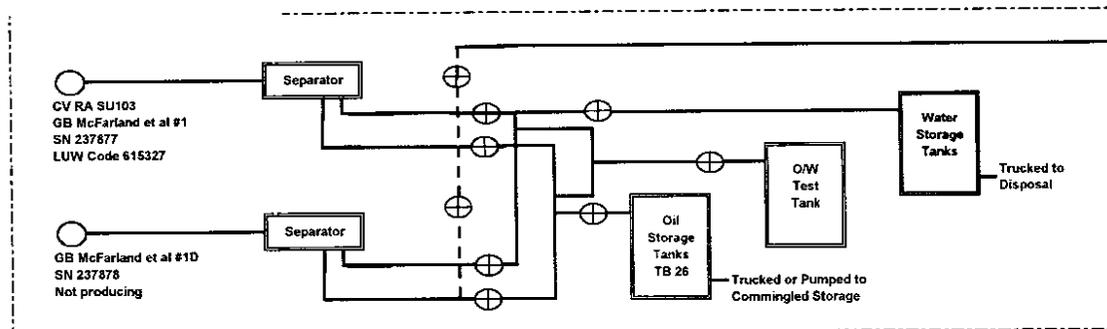
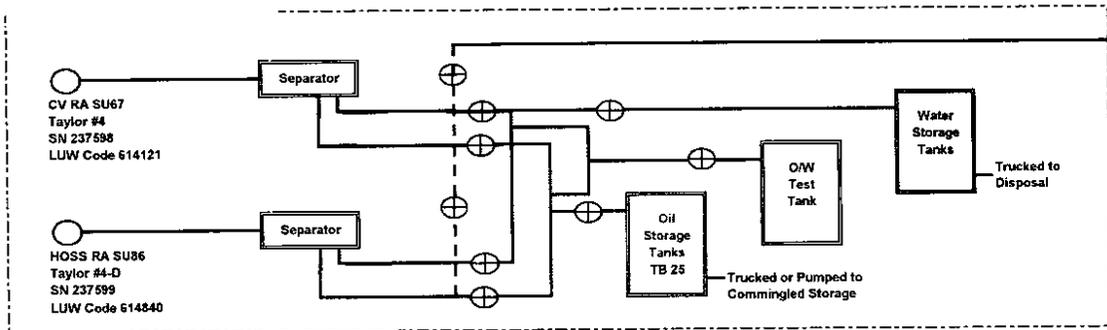
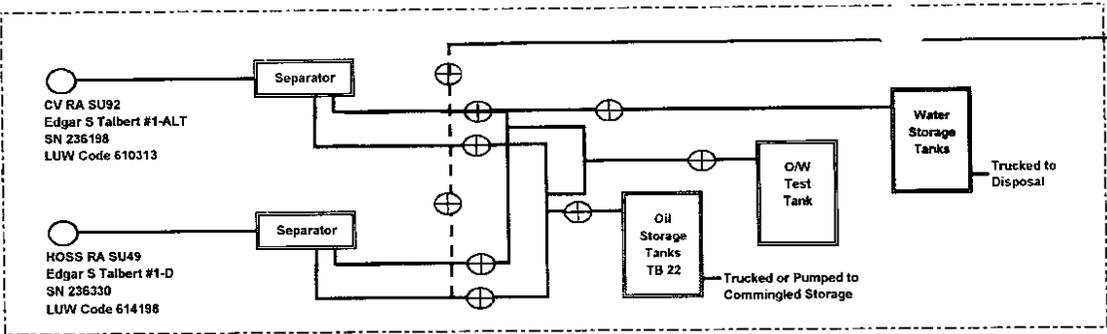
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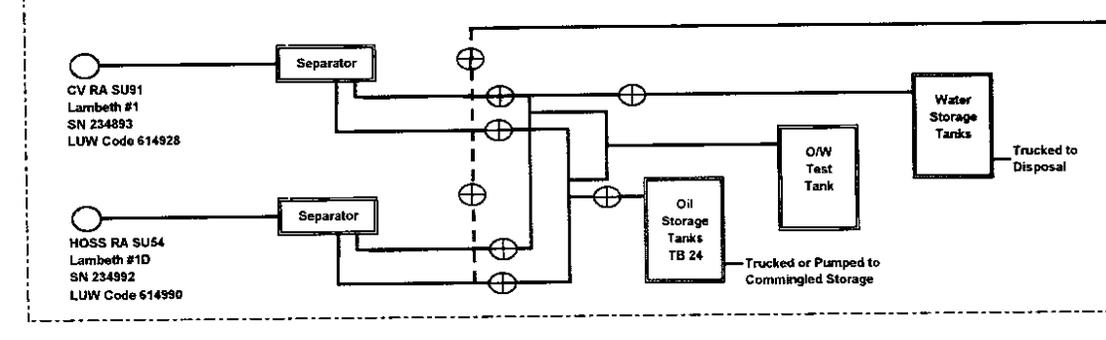
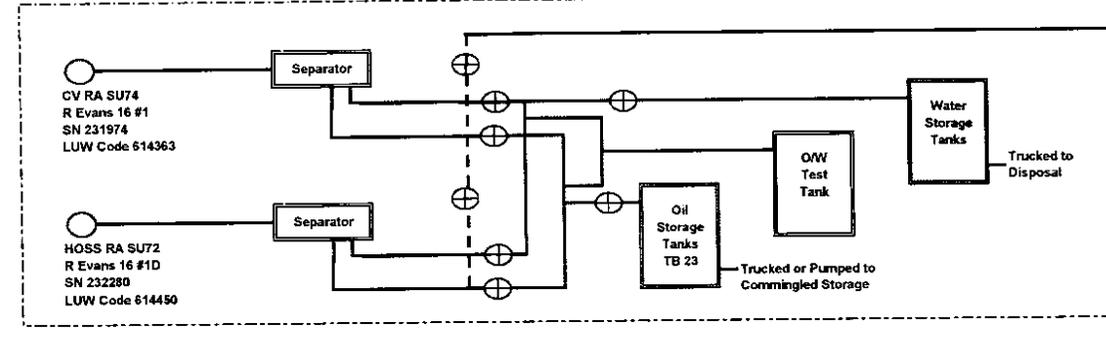
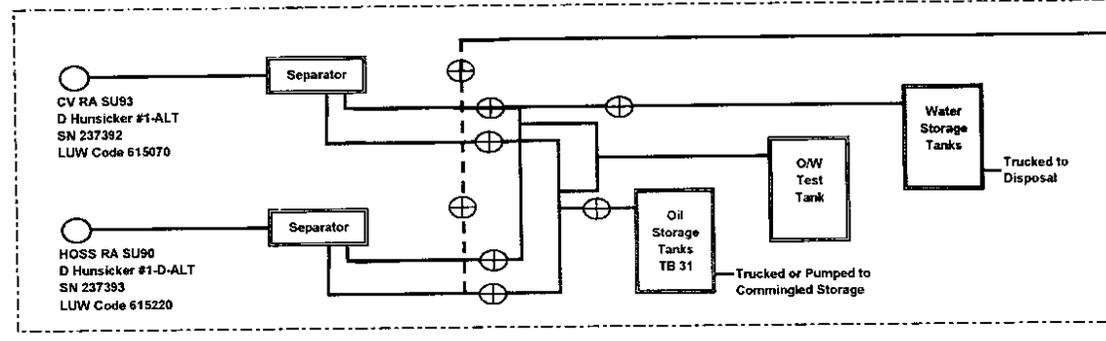
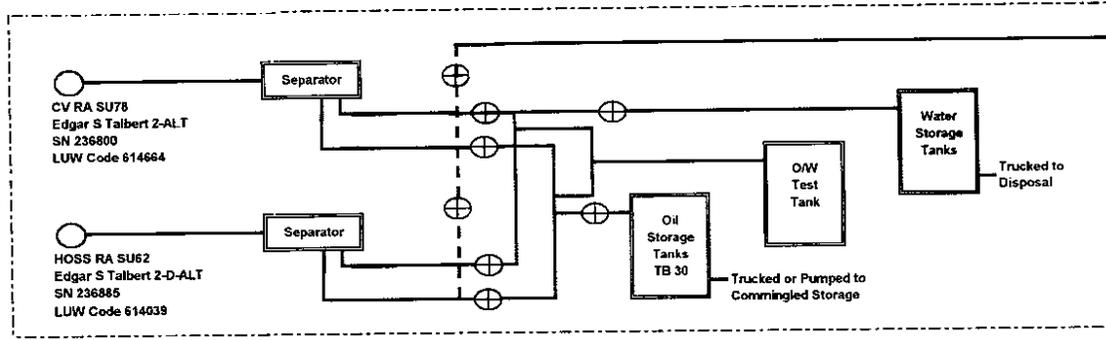
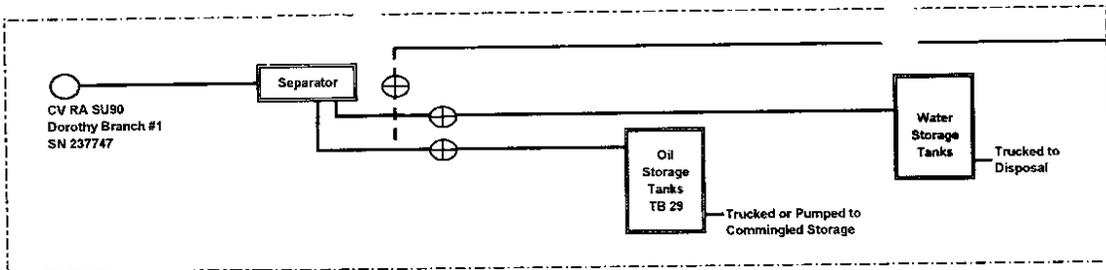


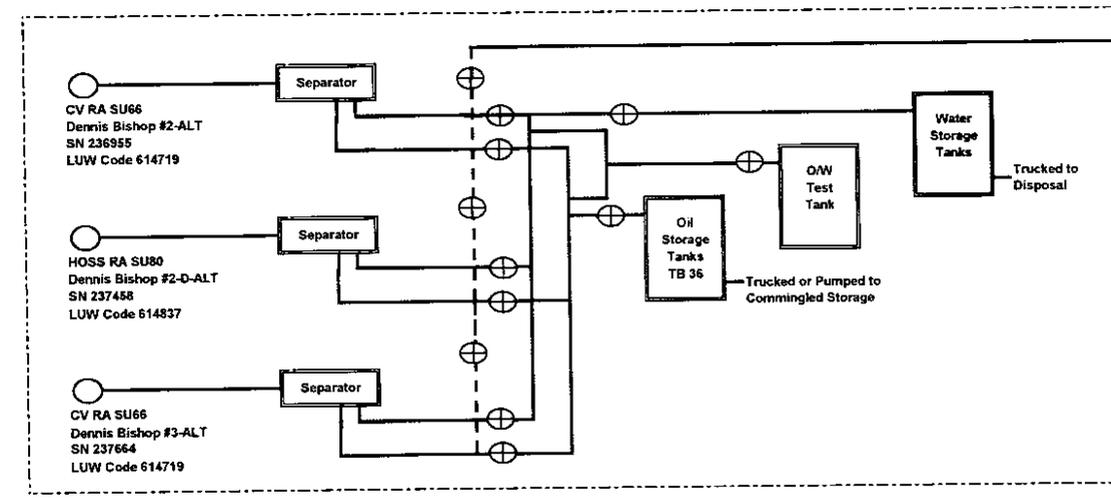
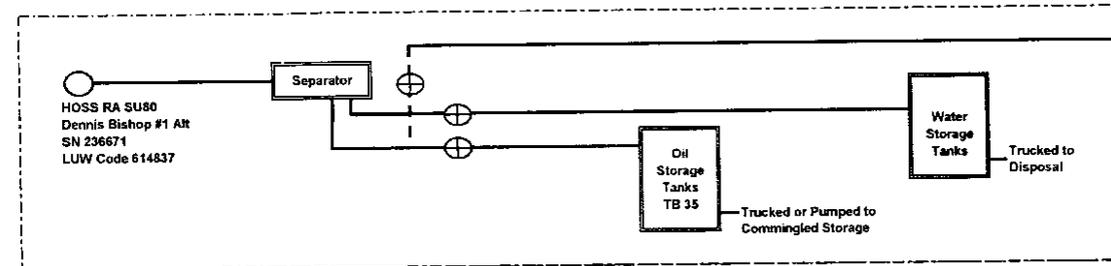
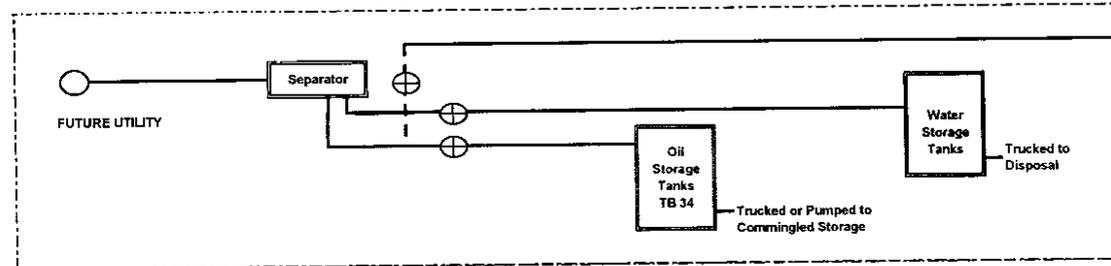
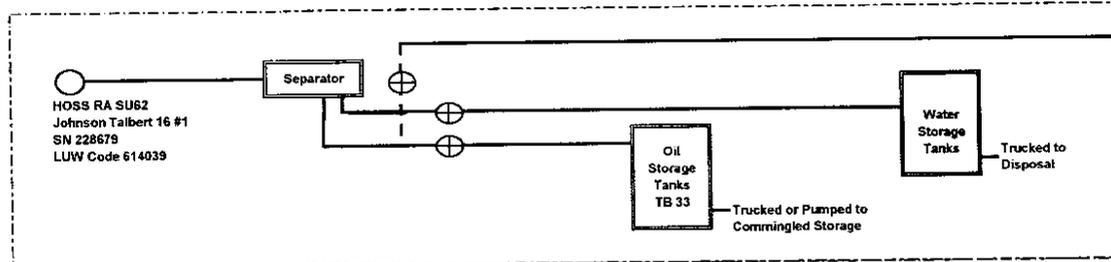
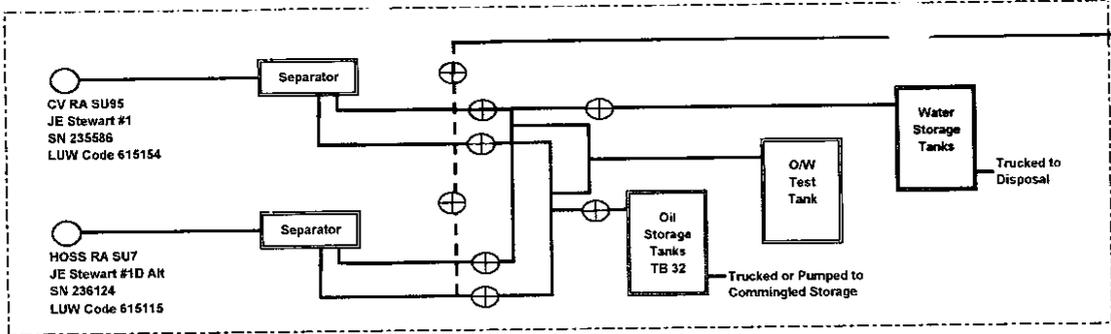


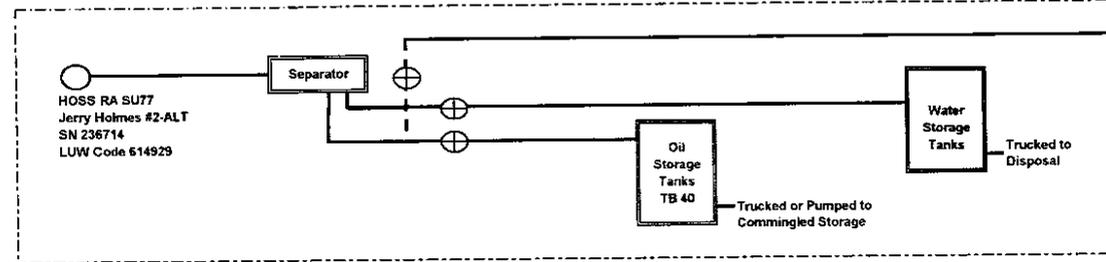
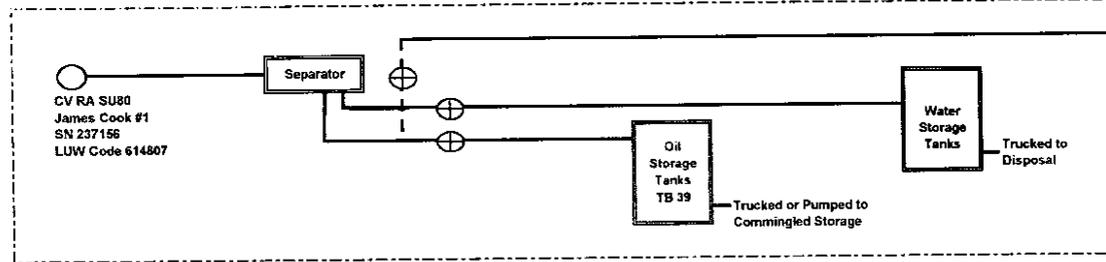
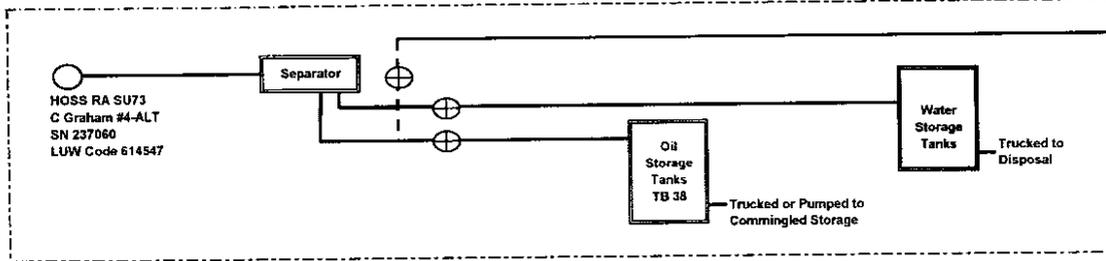
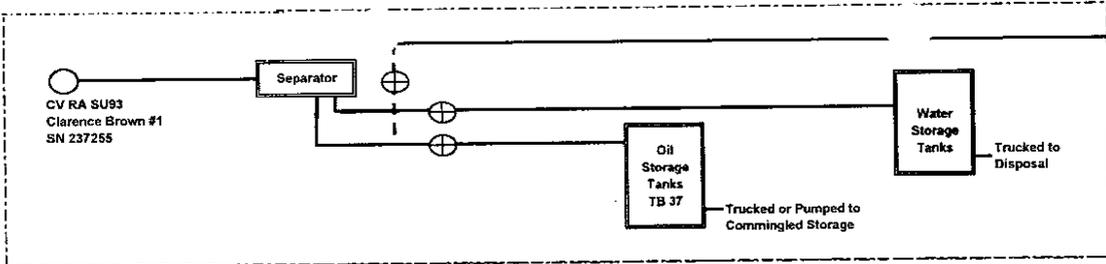


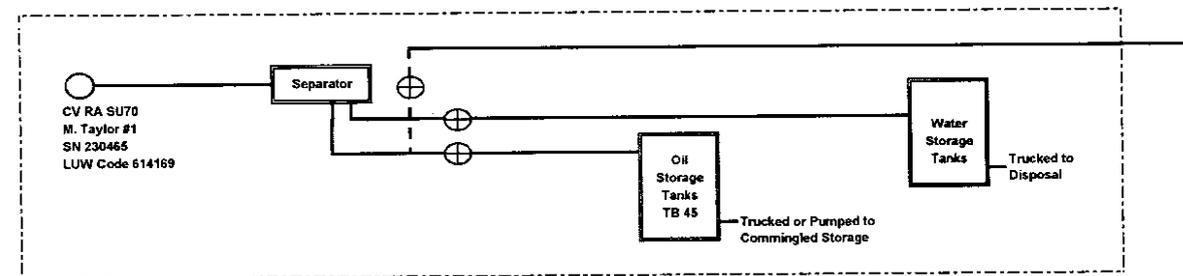
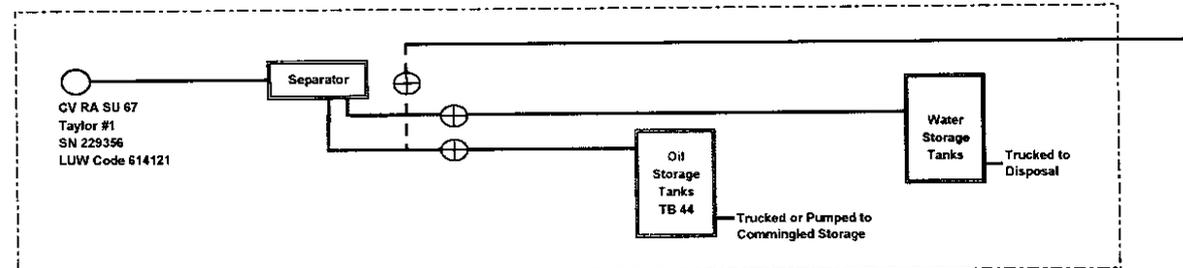
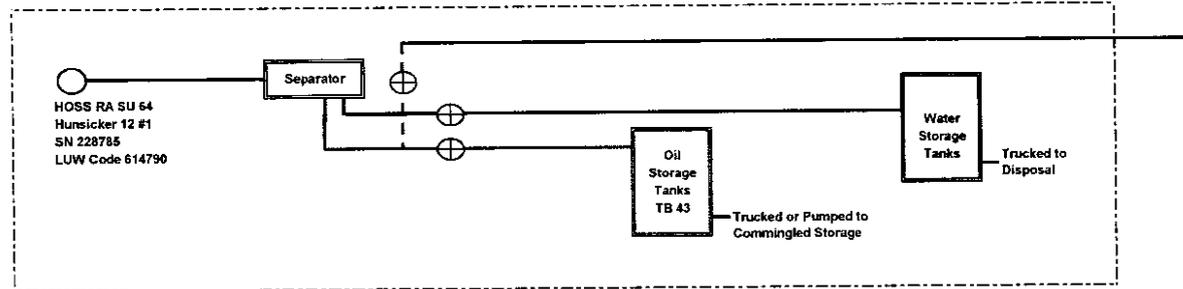
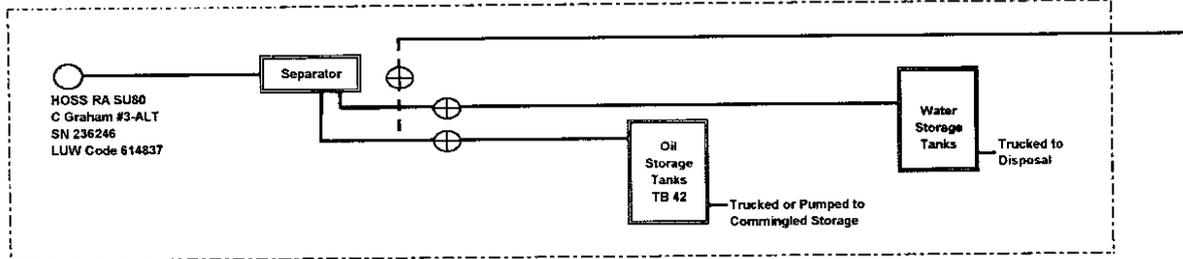
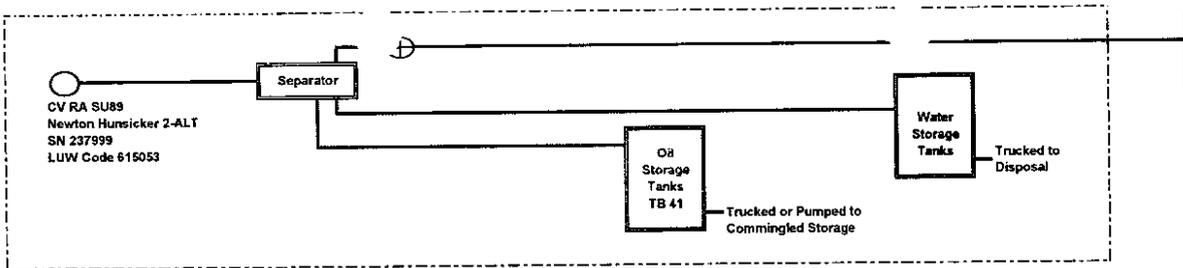


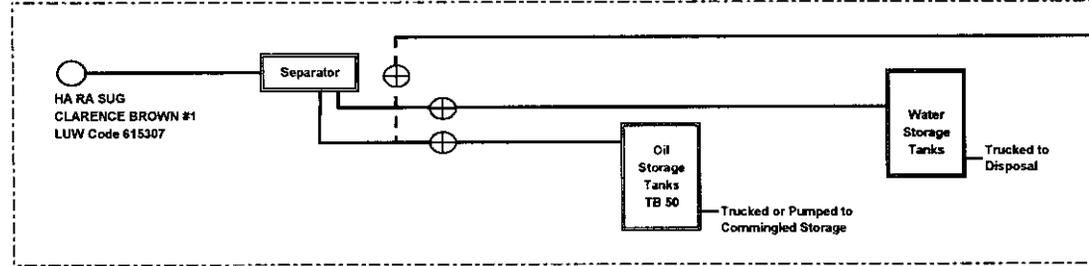
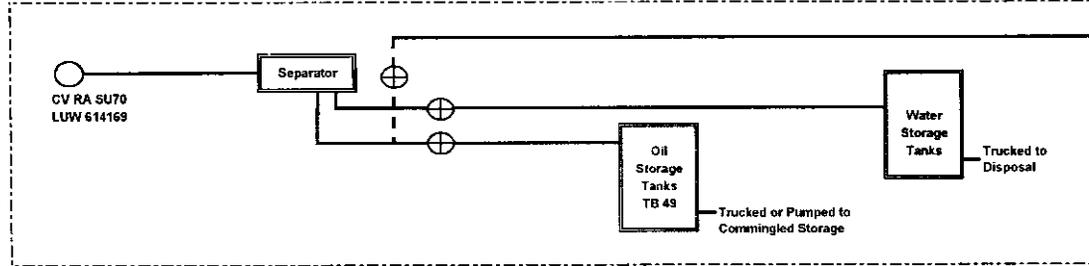
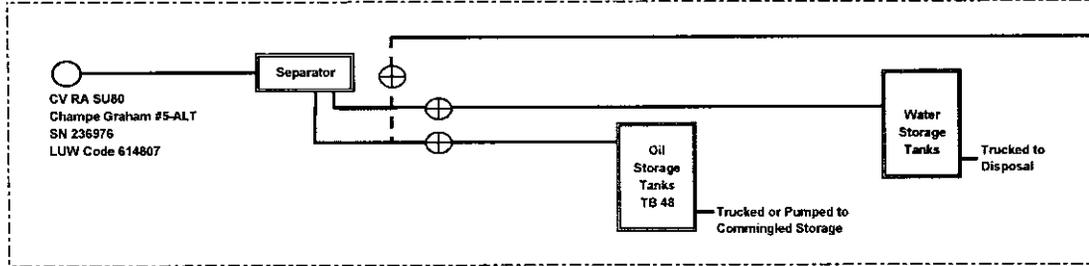
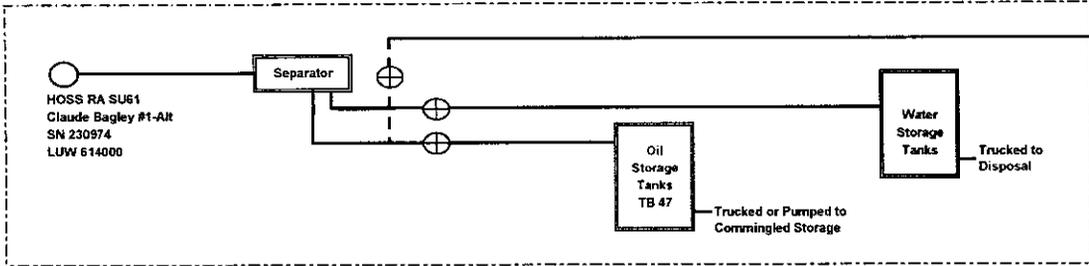
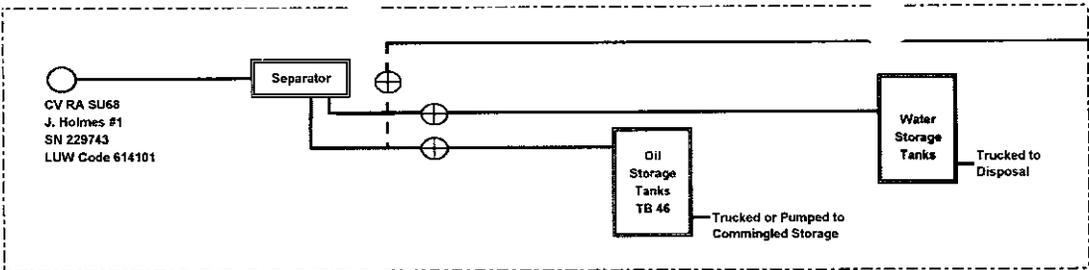


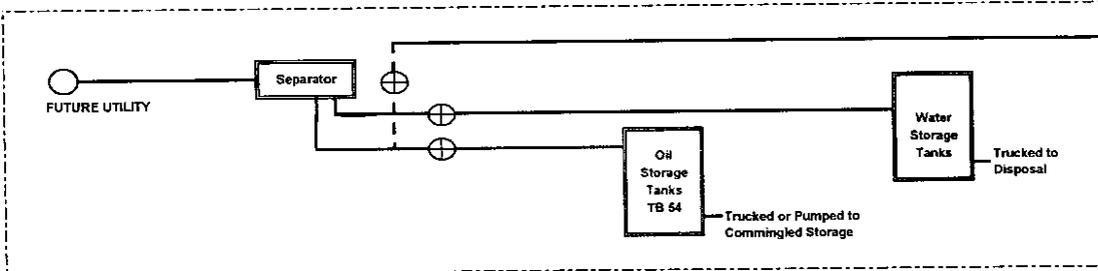
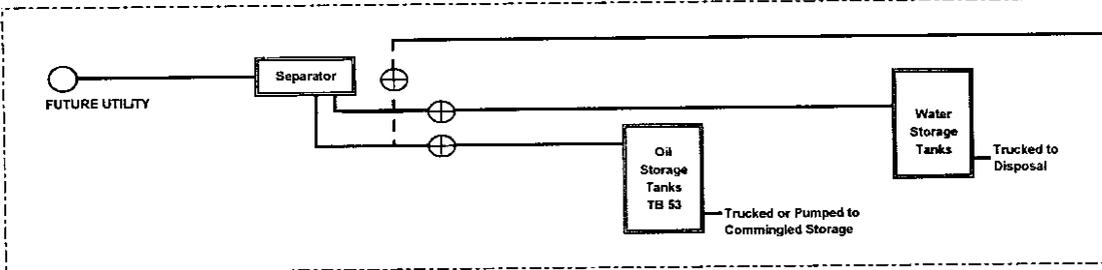
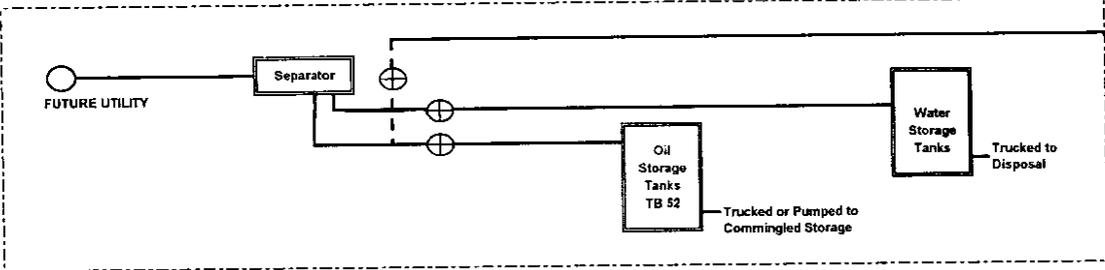
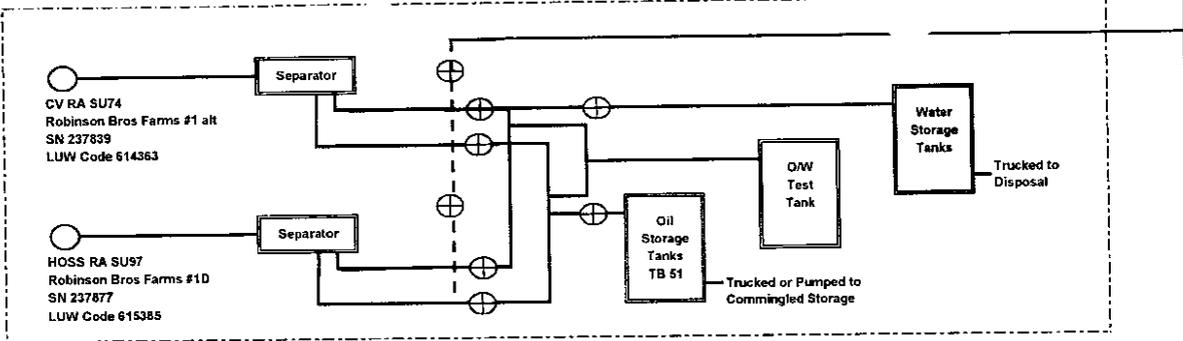


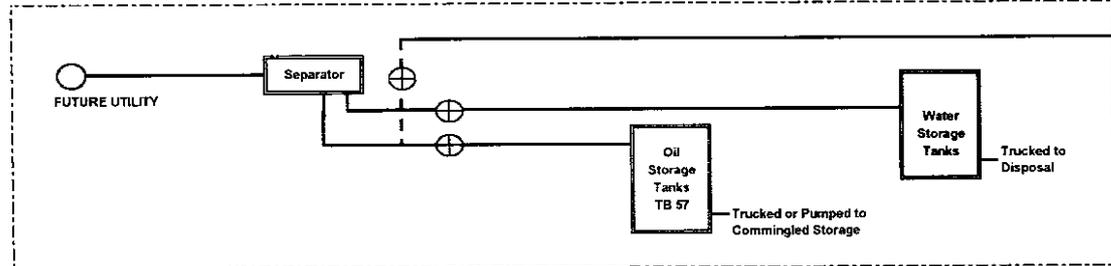
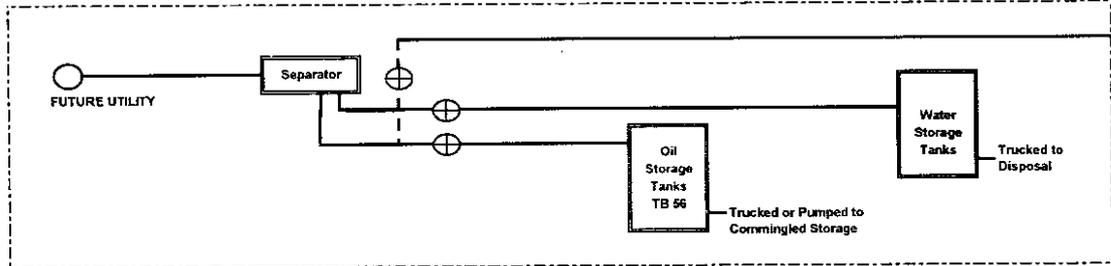
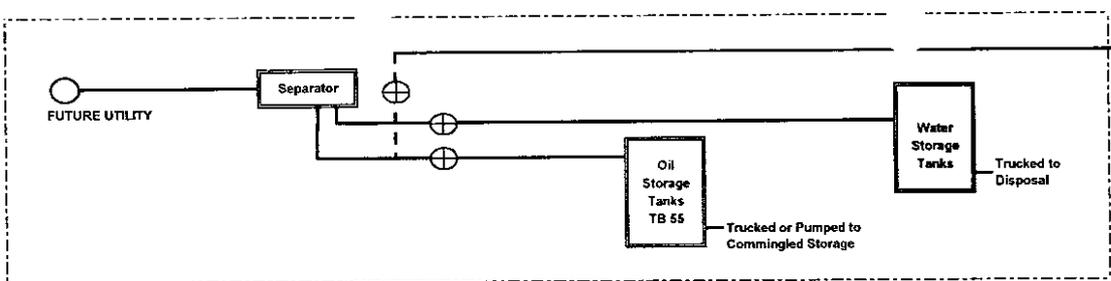




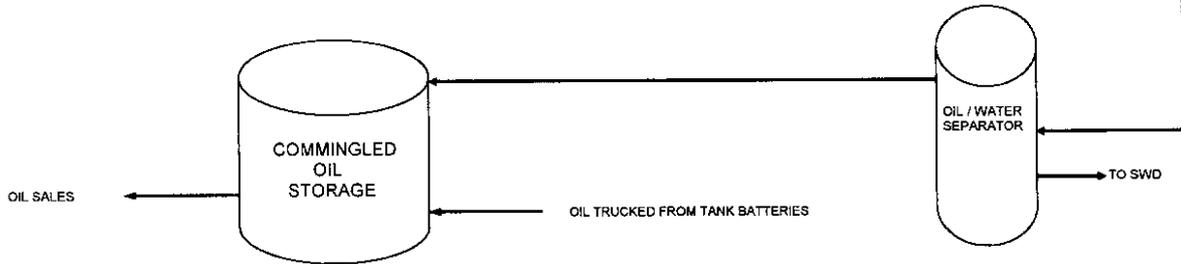








GAS COMMINGLED BY CONTINUOUS METERING UNDER SEPARATE COMMINGLING ORDER



Legend:	————— TOTAL SEPARATOR FLUIDS	⊕ VALVE
	————— OIL / CONDENSATE	⊖ OIL/Condensate Tank Battery
	————— SALTWATER	
	————— TOTAL OIL/SALTWATER TEST	
		GAS COMMINGLING

Goodrich Petroleum Company, L.L.C.

Commingling Facility No. 25

Oil / Condensate Commingling by Well Test

Bethany Longstreet Field, Louisiana

Revision Date: October 22, 2009

Not to Scale

DOCKET NO. 09 - EXHIBIT B