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January 3, 2011

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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: S Sand. Reservoir A

9,200' Sand, Reservoirs A, B, and C

West Black Bay Field

Plaquemines Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of HELIS OIL & GAS COMPANY, L.L.C. for the calling of public hearings, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the West Black Bay Field, Plaquemines Parish, Louisiana:

- To amend the spacing provisions of Office of Conservation Order No. 437-A, effective 1. October 1, 1958, as amended and supplemented by the 437-A Series of Orders, to eliminate any special spacing or well density provisions within or outside the buffer zone for production from the S Sand and to provide that any future wells drilled within or outside the buffer zone or within or outside existing units for the S Sand in West Black Bay Field be exempt from the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- To amend the spacing provisions of Office of Conservation Order No. 437-B, effective 2. October 1, 1958, as amended and supplemented by the 437-B Series of Orders, to eliminate any special spacing or well density provisions within or outside the buffer zone for production from the 9,200' Sand, and to provide that any future wells drilled within or outside the buffer zone or within or outside existing units for the 9,200' Sand in West Black Bay Field be exempt from the spacing provisions of LAC 43:XIX.1901 et seq. (Statewide Order No. 29-E).
- Except to the extent herein contrary, to confirm and continue in effect all other pertinent provisions of the above referenced orders, the units created thereby and applicable Statewide Orders.

January 3, 2011

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

The S Sand, in West Black Bay Field, Plaquemines Parish, Louisiana, was defined in Office of Conservation Order No. 437-A, effective October 1, 1958.

The 9,200' Sand, in West Black Bay Field, Plaquemines Parish, Louisiana, was previously defined in the 437-B Series of Office of Conservation Orders.

Any pertinent data not available at the Office of Conservation relating to the applicant's proposals can be obtained, **AT THE COST OF THE REQUESTING PARTY**, from 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 January 13, 2011, WILL NOT BE HELD.

Units for the S Sand, Reservoir B, and the 9200' Sand, Reservoir D, are already exempt from the spacing provisions of Statewide Order No. 29-E. In the opinion of the applicant, by making existing spacing provisions inside and outside existing units for these sands consistent, orderly development will be facilitated without causing harm or injury to others.

Attached hereto and made a part hereof are plats outlining the existing units and reservoirs 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 sent. 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 provided to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented 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.

Very truly yours,

Richard W. Revels, Jr.

RWRjr/dbf Enclosures

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



