

March 7, 2011

Ref: 4181-30004

Honorable James H. Welsh
Commissioner of Conservation
Post Office Box 94275
Baton Rouge, LA 70804-4275

Re: Hearing Application
13300' Zone, Reservoir B
GROSSE ISLE FIELD
Vermilion Parish, Louisiana
Applicant: Pennington Operating Company, LLC

Dear Mr. Commissioner:

In accordance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, application is hereby made on behalf of **Pennington Operating Company, LLC** 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 relating to the 13300' Zone, Reservoir B in the Grosse Isle Field, Vermilion Parish, Louisiana.

1. To create a single drilling and production unit of approximately 305 acres for the 13300' Zone, Reservoir B, SUA, designated as the 13300' RB SUA, Grosse Isle Field, Vermilion Parish, Louisiana, all as shown more particularly on the revised attached plat;
2. To establish rules and regulations governing the exploration for and production of gas and condensate from the said unit;
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created, with each tract sharing in unit production on a surface acreage basis of participation;
4. To consider such other matters relating to the subject reservoir as may be appropriate and justified by the evidence presented at the public hearing.

The 13300' Zone, Reservoir A in the Grosse Isle Field, Vermilion Parish, Louisiana was previously defined in Office of Conservation Order No. 447-AA, effective August 18, 2009.

In compliance with the Rules of Procedure for Conducting Hearings Before the Commissioner of Conservation of the State of Louisiana, a pre-application conference was held in Lafayette, Louisiana on February 16, 2011. Attached hereto and made a part hereof is a list of the names and addresses of the parties who were in attendance at that conference.

The conference was opened by Mr. B. J. Duplantis. Mr. David Comeaux of Leon Comeaux & Associates presented the plan of applicant. Mr. Bill Dale of W. H. Robbins & Associates on behalf of Dan Durr, et al presented a plan of 300 acres, extending the southern boundary south of La. 14. Mr. Jim Hardwick on behalf of the Zenon Family presented a plan of 260 acres extending the northern boundary and decreasing the western boundary. Mr. Travis Helms of James Hardwick & Associates on behalf of James Broussard presented a plan of 220 acres. Mr. David Sturlese on behalf of the City of Abbeville supported the original plan of applicant and also supports the revised plan. Questions were asked and answered. The parties who presented counterplans agreed to the revised plat. The rights of all other parties to file counterplans were reserved. It is not known if there will be opposition at the public hearing on this matter. Should any party want an additional conference, we will schedule one.

Attached hereto and made a part hereof is a revised plat outlining the 13300' RB SUA, Grosse Isle Field, Vermilion Parish, Louisiana, and a list of the names and addresses of the interested owners, represented parties and interested parties to whom this notice is being sent. It is hereby certified that a reasonable effort was made to ascertain the names and addresses of all interested owners, represented parties and interested parties.

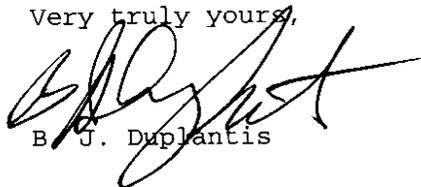
A copy of the list of the names and addresses of the interested owners, represented parties and interested parties is not being mailed to those parties along with this hearing application. Should any such party desire a copy of this list, however, we will be glad to provide one upon request.

Upon receipt of the legal notice in the captioned matter, the notice will be posted, published and mailed in accordance with Rule 7 of the Rules of Procedure.

Any pertinent data relating to the proposed unit can be obtained, AT THE COST OF THE REQUESTING PARTY, from Mr. David Comeaux of Leon Comeaux & Associates, P. O. Box 53922, Lafayette, LA 70505 (337) 233-9839.

Finally, there is enclosed herewith our check on behalf of the applicant in the amount of \$755.00, made payable to the Office of Conservation, representing the required hearing application fee.

Very truly yours,



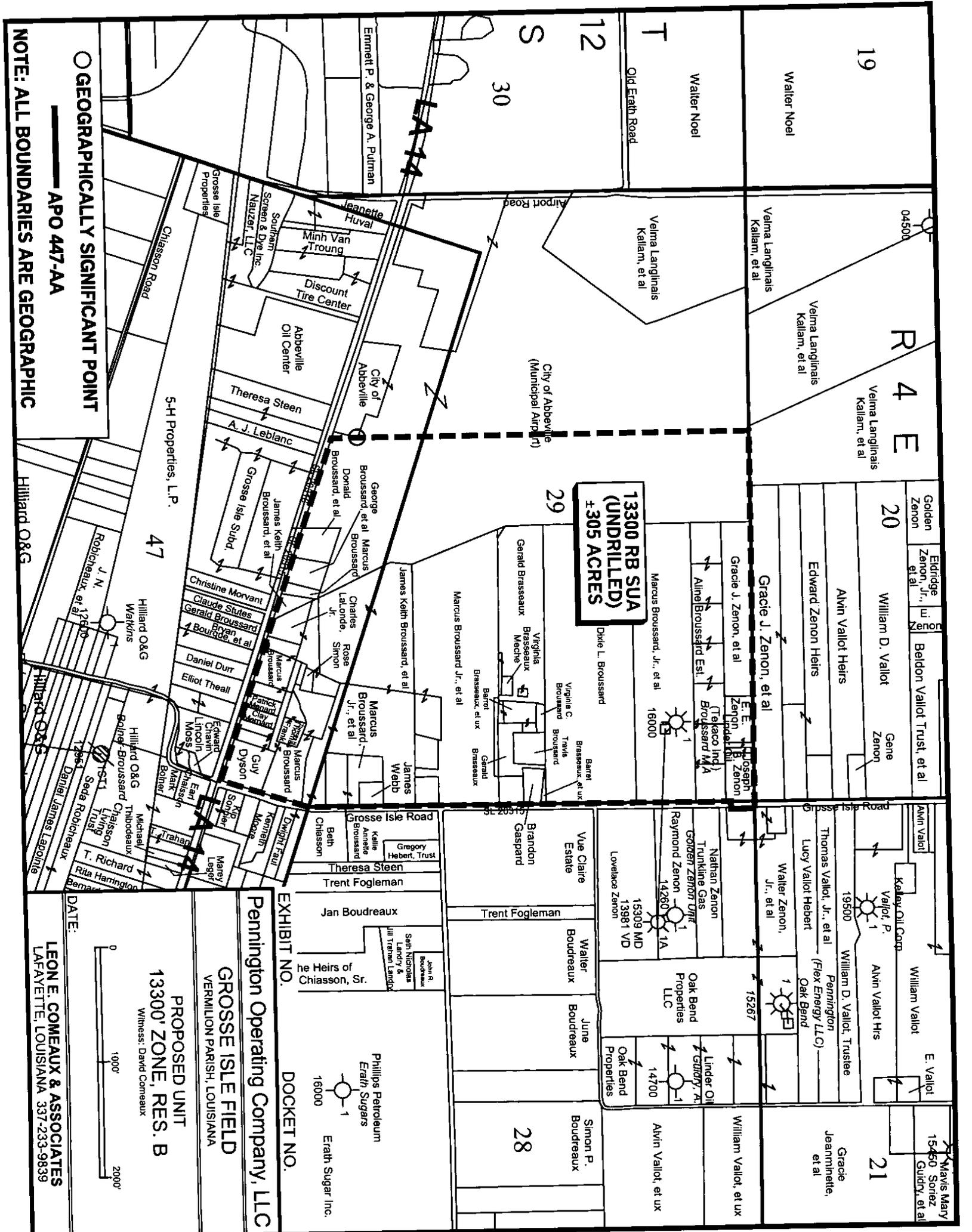
B. J. Duplantis

BJD/ht

Attachments

cc: Mr. Richard Hudson, District Manager
Office of Conservation

All Interested Owners, Represented Parties
and Interested Parties



**13300 RB SUA
(UNDRILLED)
±305 ACRES**

○ GEOGRAPHICALLY SIGNIFICANT POINT
 — APO 447-AA
 NOTE: ALL BOUNDARIES ARE GEOGRAPHIC

EXHIBIT NO. **Pennington Operating Company, LLC**
GROSSE ISLE FIELD
 VERMILION PARISH, LOUISIANA

DOCKET NO. **13300' ZONE, RES. B**
 Proposed Unit
 Witness: David Comeaux

DATE: _____
LEON E. COMEAUX & ASSOCIATES
 LAFAYETTE, LOUISIANA 337-233-9839

