

Honorable James H. Welsh
Commissioner of Conservation
Department of Natural Resources
P. O. Box 94275
Baton Rouge, Louisiana 70804-9275

RE: Wilcox Zone, Reservoir B
Wilcox Zone, Reservoir C
WEST GORDON FIELD
Beauregard Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of **MIDSTATES PETROLEUM COMPANY, LLC** to the Commissioner of Conservation 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 Wilcox Zone, Reservoir B and Reservoir C, in the West Gordon Field, Beauregard Parish, Louisiana.

1. To establish rules and regulations governing the exploration for and production of oil and gas from the Wilcox Zone, Reservoir C, in the West Gordon Field, Beauregard Parish, Louisiana.

2. To create a single drilling and production unit for the Wilcox Zone, Reservoir C and to force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created.

3. To create one additional drilling and production unit (SUB) for the Wilcox Zone, Reservoir B and to force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created.

4. To continue in full force and effect the rules and regulations established by Office of Conservation Order No. 1328-A-2, effective March 10, 2009, for the Wilcox Zone, Reservoir B, in the West Gordon Field, Beauregard Parish, Louisiana.

5. To designate a unit operator and a unit well for the units so created as may be appropriate.

6. To provide that any well drilled outside of the Wilcox Zone, Reservoir C, shall be in accordance with the spacing provisions of Statewide Order No. 29-E.

7. To provide that the Commissioner may reclassify the Reservoirs by supplemental orders and without the necessity of a public hearing should such reclassification be warranted, based on evidence furnished the Commissioner.

8. To discuss any other matters that may be pertinent to this application.

The Wilcox Zone, Reservoir B, in the West Gordon Field, Beauregard Parish, Louisiana, was previously defined in Office of Conservation Order No. 1328-A-2, effective March 10, 2009.

The Wilcox Zone, Reservoir C, in the West Gordon Field, Beauregard Parish, Louisiana, is hereby defined as that oil and gas bearing zone encountered between the depths of 12,245' and 14,503' (electrical log measurements) in the Midstates Petroleum Company (fmlly Humble Oil & Refg. Co.)- Edgewood Land & Log No. 1 Well, located in Section 1, Township 7 South, Range 10 West, Beauregard Parish, Louisiana.

In addition to furnishing the legal notice to all Interested Parties, the applicant will provide for POSTING of the legal notice of the hearing and unit plats in a prominent place in the area of the West Gordon Field, Beauregard Parish, Louisiana, and will cause the legal notice of the hearing to be PUBLISHED in a newspaper of general circulation published in the vicinity of the West Gordon Field, Beauregard Parish, Louisiana, at least fifteen (15) days before the hearing date.

Any pertinent data relating to the subject application can be obtained, **AT THE COST OF THE REQUESTING PARTY**, from David Comeaux at Leon E. Comeaux & Associates, P. O. Box 53922, Lafayette, Louisiana 70505 (337)233-9839.

In compliance with the Rules of Procedure, a preapplication conference was held in Lafayette, Louisiana, on March 31, 2011 at which the parties named on the attached list were in attendance.

The conference was opened with a discussion by Mr. David Comeaux, representing MidStates Petroleum Company, LLC, concerning the nature and purpose of the conference and the bases for the applicant's proposed units. Questions were asked and answered, but there were no counter plans presented. It is anticipated that there will be no opposition at the hearing.

There are attached hereto and made a part hereof a plat outlining the proposed units, the conference attendance list, and a list of the names and addresses of the Interested Owners, Represented Parties, and Interested Parties to whom this application is being sent. Pursuant to the Revised Rules of Procedure, such list of parties and proposed unit plat (**being the same plat attached to the March 10, 2011 preapplication notice**) are being furnished **ONLY** to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, said plat and 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, Represented Parties and Interested Parties.

Finally, there is enclosed our check on behalf of the applicant, MidStates Petroleum Company, LLC, in the sum of \$755.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E. COMEAUX & ASSOCIATES


David Comeaux

DC/cu

Enclosures

cc: Mr. Richard Hudson
Office of Conservation
825 Kaliste Saloom Road
Brandywine III, Suite 220
Lafayette, Louisiana 70508-4284

Interested Parties, Interested Owners
and Represented Parties

