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April 15, 2011

OF COUNSEL
WILLIAM G. CONLY

Honorable James H. Welsh
Commissioner of Conservation
State of Louisiana
Post Office Box 44275
Baton Rouge, Louisiana 70804-4275

Re: APPLICATION FOR PUBLIC HEARING.

Pettet Formation, Reservoir A; Rodessa Formation, Reservoir B; Hosston Formation, Reservoir A; and Cotton Valley Formation, Reservoir A; CASPIANA FIELD, Caddo and DeSoto Parishes, Louisiana.

Dear Sir:

J-W OPERATING COMPANY ("Applicant") hereby respectfully applies for a public hearing to consider evidence relative to the issuance of Orders pertaining to the following matters relating to the Pettet Formation, Reservoir A; the Rodessa Formation, Reservoir B; the Hosston Formation, Reservoir A; and to the Cotton Valley Formation, Reservoir A; all in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana:

Pettet Formation, Reservoir A

1. To create two (2) additional drilling and production units for the exploration for and production of gas and condensate from the Pettet Formation, Reservoir A, such units being shown on attached plats and being designated PET RA SU91 and PET RA SU92.
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within these proposed units in accordance with Section 10, Title 30, of the Louisiana Revised Statutes of 1950, with each tract sharing in unit production on a surface acreage basis of participation.
3. To designate a unit operator of, and a unit well for, each of the proposed units as may be appropriate.
4. To redefine the Pettet Formation, Reservoir A, in the Caspiana Field, INSO FAR AND ONLY INSO FAR as to these proposed units, as being that gas and condensate bearing interval encountered between the depths of 5,494 feet and 5,845 feet, electrical log measurements, in the J-W Operating Company (formerly Tenneco Oil Company)--Eugene Turner et al. No. 1 Well, located in Section 13, Township 15 North, Range 13 West, DeSoto Parish, Louisiana.

5. To extend, except as in conflict herewith, the provisions of the Office of Conservation Order No. 191-C series of Orders, and of all applicable Statewide Orders, to the proposed units.

6. To discuss such other matters as may be pertinent to the Pettet Formation, Reservoir A.

The Pettet Formation, Reservoir A, in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana, was initially defined in Office of Conservation Order No. 191-C, effective April 13, 1976.

Rodessa Formation, Reservoir B

1. To redefine the Rodessa Formation, Reservoir B, in the Caspiana Field, INSOFAR AND ONLY INSOFAR as to the existing units designated ROD RB SUH and ROD RB SUK, such units being shown on attached plats, as being that gas and condensate bearing interval encountered between the depths of 4,577 feet and 5,494 feet, electrical log measurements, in the J-W Operating Company (formerly Tenneco Oil Company)--Eugene Turner et al. No. 1 Well, located in Section 13, Township 15 North, Range 13 West, DeSoto Parish, Louisiana.

2. To confirm and continue in full force and effect the units designated ROD RB SUH and ROD RB SUK as drilling and production units for the exploration for and production of gas and condensate from the Rodessa Formation, Reservoir B, in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana, as redefined in the manner provided above.

3. To continue in full force and effect, except as in conflict herewith, the provisions of the Office of Conservation Order No. 191-D series of Orders, and of all applicable Statewide Orders, to the units designated ROD RB SUH and ROD RB SUK.

4. To discuss such other matters as may be pertinent to the Rodessa Formation, Reservoir B.

The Rodessa Formation, Reservoir B, in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana, was initially defined in Office of Conservation Order No. 191-D-3, effective February 1, 2000.

Hosston Formation, Reservoir A

1. To redefine the Hosston Formation, Reservoir A, in the Caspiana Field, INSOFAR AND ONLY INSOFAR as to the existing unit designated HOSS RA SUL, such unit being shown on an attached plat, as being that gas and condensate bearing interval encountered between the depths of 5,845 feet and 8,276 feet, electrical log measurements, in the J-W Operating Company (formerly Tenneco Oil Company)--Eugene Turner et al No. 1 Well, located in Section 13, Township 15 North, Range 13 West, DeSoto Parish, Louisiana.

2. To confirm and continue in full force and effect the unit designated HOSS RA SUL as a drilling and production unit for the exploration for and production of gas and condensate from the Hosston Formation, Reservoir A, in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana, as redefined in the manner provided above.

3. To continue in full force and effect, except as in conflict herewith, the provisions of the Office of Conservation Order No. 191-B series of Orders, and of all applicable Statewide Orders, to the unit designated HOSS RA SUL.

4. To discuss such other matters as may be pertinent to the Hosston Formation, Reservoir A.

The Hosston Formation, Reservoir A, in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana, was initially defined in Office of Conservation Order No. 191-B, effective April 15, 1975.

Cotton Valley Formation, Reservoir A

1. To redefine the Cotton Valley Formation, Reservoir A, in the Caspiana Field, INSO FAR AND ONLY INSO FAR as to the existing units designated CV RA SUE and CV RA SUL, such units being shown on attached plats, as being that gas and condensate bearing interval encountered between the depths of 8,276 feet and 9,500 feet, electrical log measurements, in the J-W Operating Company (formerly Tenneco Oil Company)--Eugene Turner et al No. 1 Well, located in Section 13, Township 15 North, Range 13 West, DeSoto Parish, Louisiana.

2. To confirm and continue in full force and effect the units designated CV RA SUE and CV RA SUL as drilling and production units for the exploration for and production of gas and condensate from the Cotton Valley Formation, Reservoir A, in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana, as redefined in the manner provided above.

3. To continue in full force and effect, except as in conflict herewith, the provisions of the Office of Conservation Order No. 191-B series of Orders, and of all applicable Statewide Orders, to the units designated CV RA SUE and CV RA SUL.

4. To discuss such other matters as may be pertinent to the Cotton Valley Formation, Reservoir A.

The Cotton Valley Formation, Reservoir A, in the Caspiana Field, Caddo and DeSoto Parishes, Louisiana, was initially defined in Office of Conservation Order No. 191-A, effective February 15, 1975.

All Intervals

1. To expand the provisions of Office of Conservation Order No. 191-13, effective December 1, 2004, to include the Rodessa Formation, Reservoir B, underlying ROD RB SUK, and the Pettet Formation, Reservoir A, underlying PET RA SU91, so as to approve the downhole combination of production from these formations and units with the intervals and units approved for downhole combination in Order No. 191-13.

2. To authorize the downhole combination of production from the Rodessa Formation, Reservoir B, underlying ROD RB SUH; the Pettet Formation, Reservoir A, underlying PET RA SU92; the Hosston Formation, Reservoir A, underlying HOSS RA SUE; and the Cotton Valley Formation, Reservoir A, underlying CV RA SUE; or any combination thereof, in any well in which the ownership interests in the units from which production is combined downhole are identical.

Any pertinent data concerning this application will be available for inspection at the offices of Mr. Joe B. Adams, 21010 Vermont Street, Livingston, Louisiana 70754. Any person wishing to inspect any such data should call Mr. Adams at (225) 686-2355 during normal business hours in order to arrange a date and time for such inspection. A copy of any such data which is not otherwise available at the Office of Conservation can be obtained from Applicant at the expense of the requesting party.

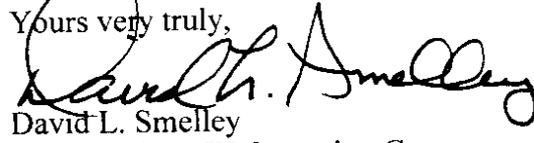
By letter dated April 4, 2011, Applicant gave notice, in accordance with the Revised Rules of Procedure, of its intention to apply for a public hearing concerning these proposals and a pre-application conference to discuss the proposals was tentatively scheduled for April 27, 2011. No conference request was received within the time provided for in the Revised Rules of Procedure; therefore the pre-application conference will not be held.

Pursuant to the Revised Rules of Procedure, Applicant has made a reasonable effort to obtain the names and addresses of all Interested Owners, Represented Parties and Interested Parties to whom notice of this application is being sent and has attached hereto a list of the names and addresses of such parties. A copy of each of the unit plats is enclosed herewith, and a copy of this letter and of the attached plats is being sent to the District Manager of the Shreveport District of the Office of Conservation and to the Interested Owners, Represented Parties and Interested Parties as shown on the attached list.

Applicant will provide for posting of a copy of the Legal Notice of this hearing, and of the enclosed plats, at a prominent place in the area affected and will cause publication of the Legal Notice in a newspaper published in the general area of Caspiana Field, all in accordance with the Revised Rules of Procedure. Furthermore, Applicant will mail a copy of the Legal Notice to all Interested Owners, Represented Parties and Interested Parties promptly upon receipt of the Legal Notice from the Commissioner.

Finally, enclosed herewith is our check payable to the Office of Conservation covering the application fee.

Yours very truly,

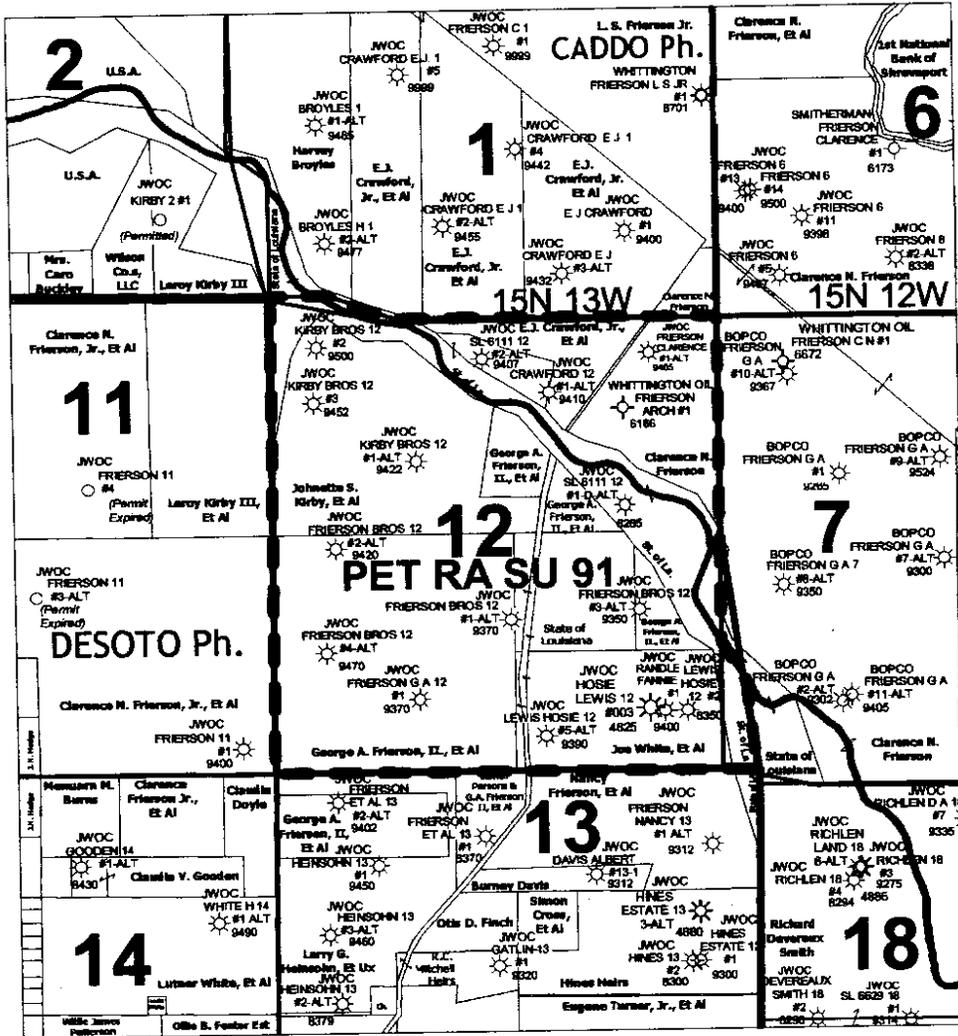


David L. Smelley

--- Attorney for J-W Operating Company

DLS:dp
Enclosures

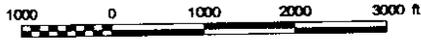
cc: Mr. James C. Broussard (w/encls.)
Mr. Michael Baca (w/encls.)
Ms. Patty DuBois (w/encls.)
Ms. Brenda Reed (w/encls.)
Ms. Tanya Allen (w/encls.)
Mr. Joe B. Adams (w/encls.)
Interested Owners, Represented Parties
and Interested Parties (w/plats only)

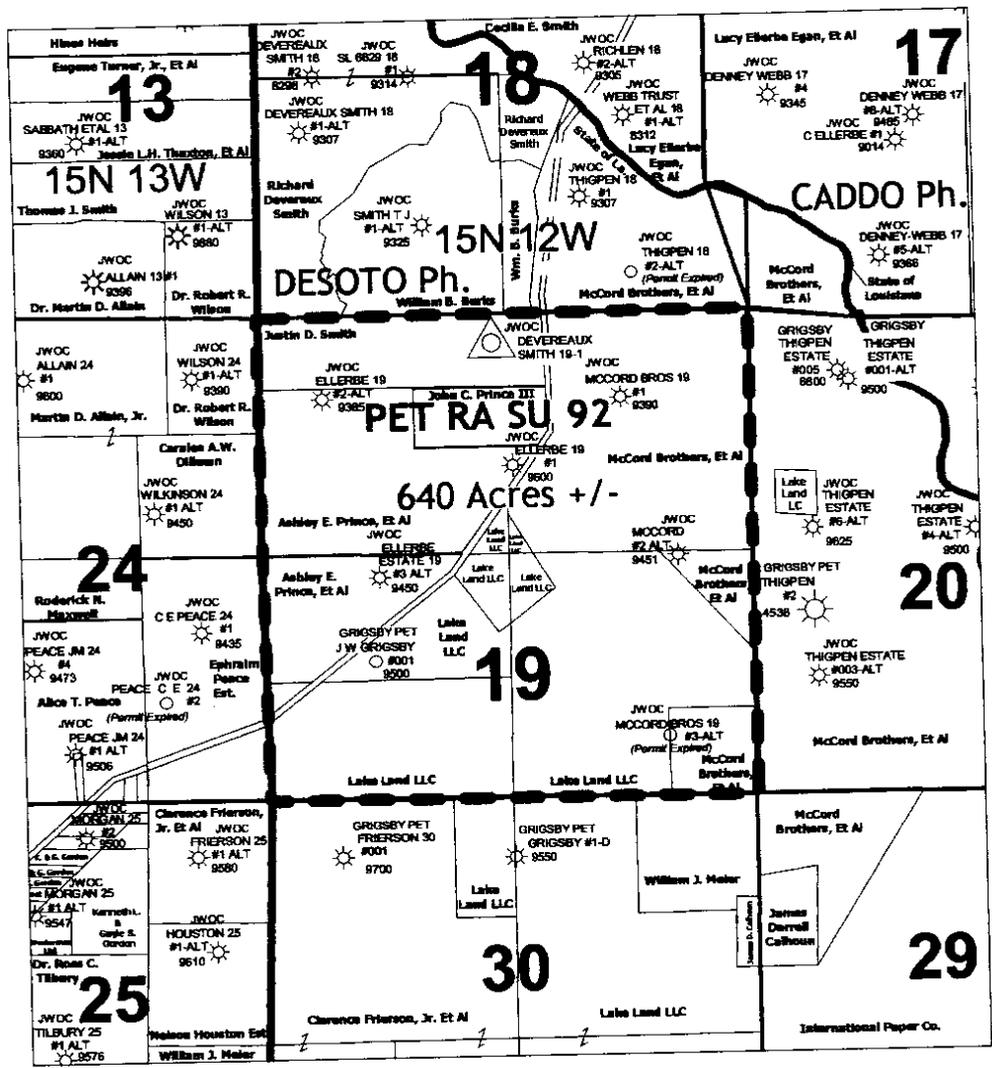


LEGEND
 - - - Proposed Pettet Unit
 * Posted Wells < 10,000'



		
J-W OPERATING COMPANY P.O. BOX 126486 DALLAS, TEXAS 75222-4486 OFFICE (972) 333-5191 FAX (972) 333-5174		
CASPIANA FIELD Caddo & Desoto Phs., La. PROPOSED PETTET UNIT And REDEFINITION OF PETTET FORMATION		
DATE:	Witness:	Docket No.
Exhibit 1	Joe Adams	10-??
	Scale:	
	1" = 2000'	

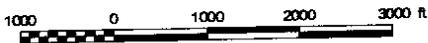


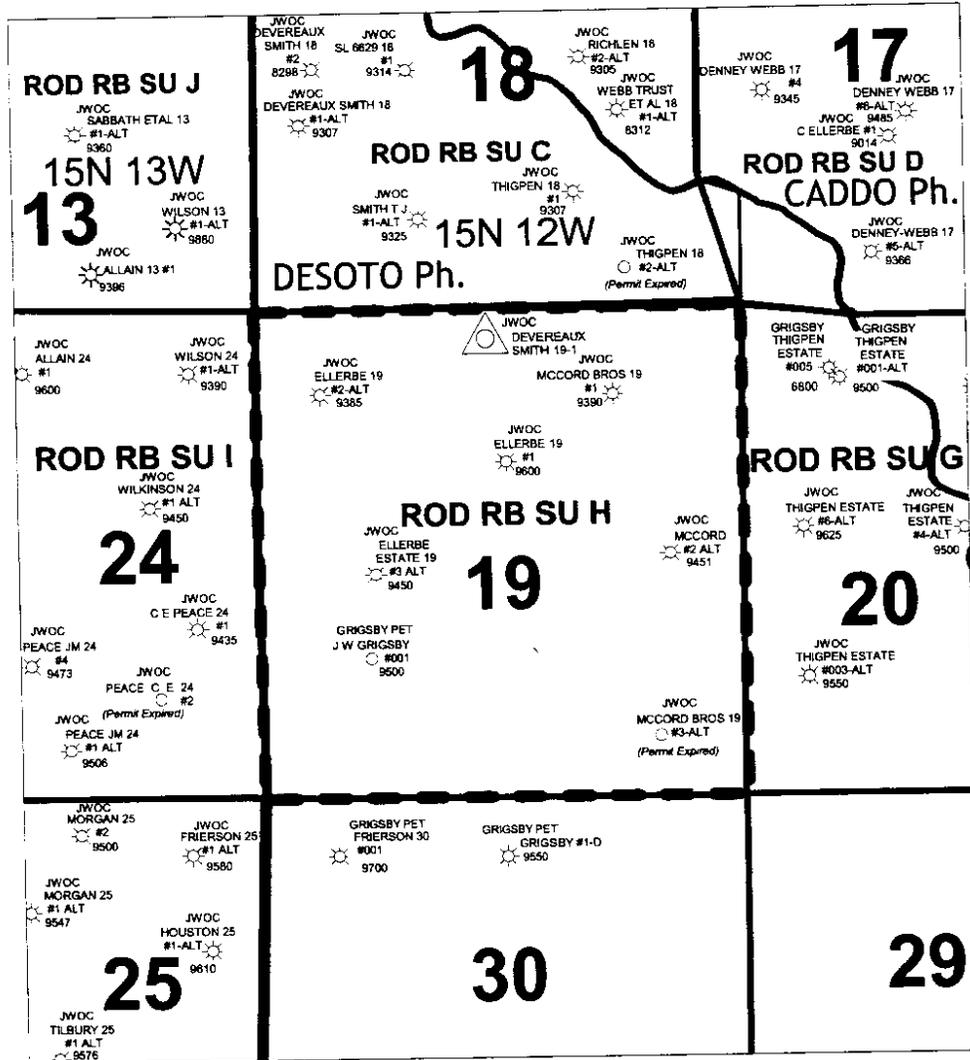


LEGEND
 - - - Proposed Pettet Unit
 * Posted Wells < 10,000'



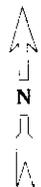
		J.W. OPERATING COMPANY P.O. BOX 224486 DALLAS, TEXAS 75222-4486 OFFICE: (972) 213-9191 FAX: (972) 951-0704
CASPIANA FIELD Caddo & Desoto Phs., La.		
<u>PROPOSED PETTET UNIT</u> <u>And REDEFINITION OF</u> <u>PETTET FORMATION</u>		
DATE:	Witness: Joe Adams	Docket No.
Exhibit 1	Scale: 1"=2000'	10-??



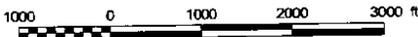


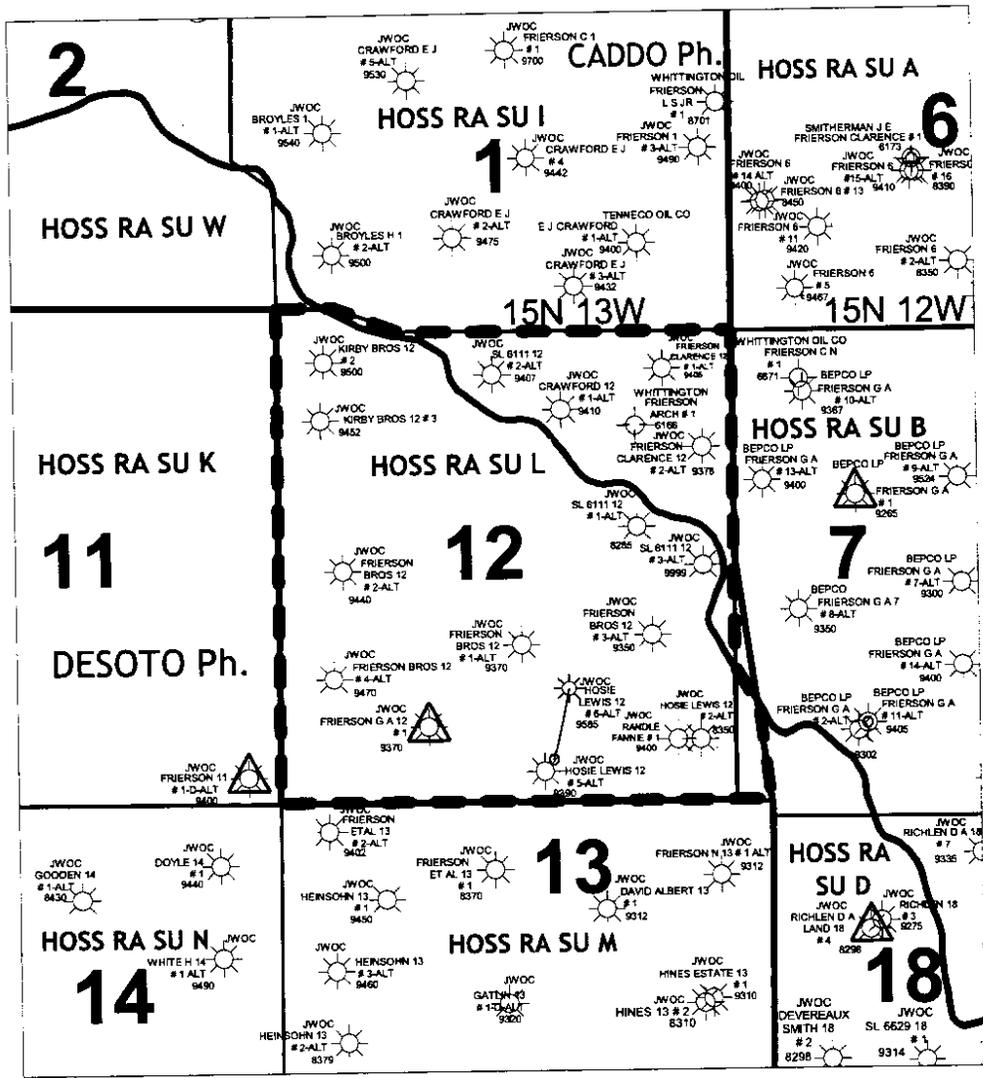
LEGEND

- Existing Units 191-D Series
- Proposed Unit Redefinition
- Approved Unit Well Location
- Posted Wells < 10,000'



JW OPERATING COMPANY P.O. BOX 226486 DALLAS, TEXAS 75222-4486 OFFICE: (972) 233-8191 FAX: (972) 991-0704		
CASPIANA FIELD Caddo & Desoto Phs., La. PROPOSED REDEFINITION OF RODESSA FORMATION		
DATE:	Witness: Joe Adams	Docket No.
Exhibit 1	Scale: 1"=2000'	10-??





LEGEND

-  Existing Units 191-B Series
-  Proposed Unit Redefinition
-  Unit Well
-  Posted Wells < 10,000'





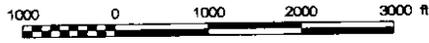
JW OPERATING COMPANY

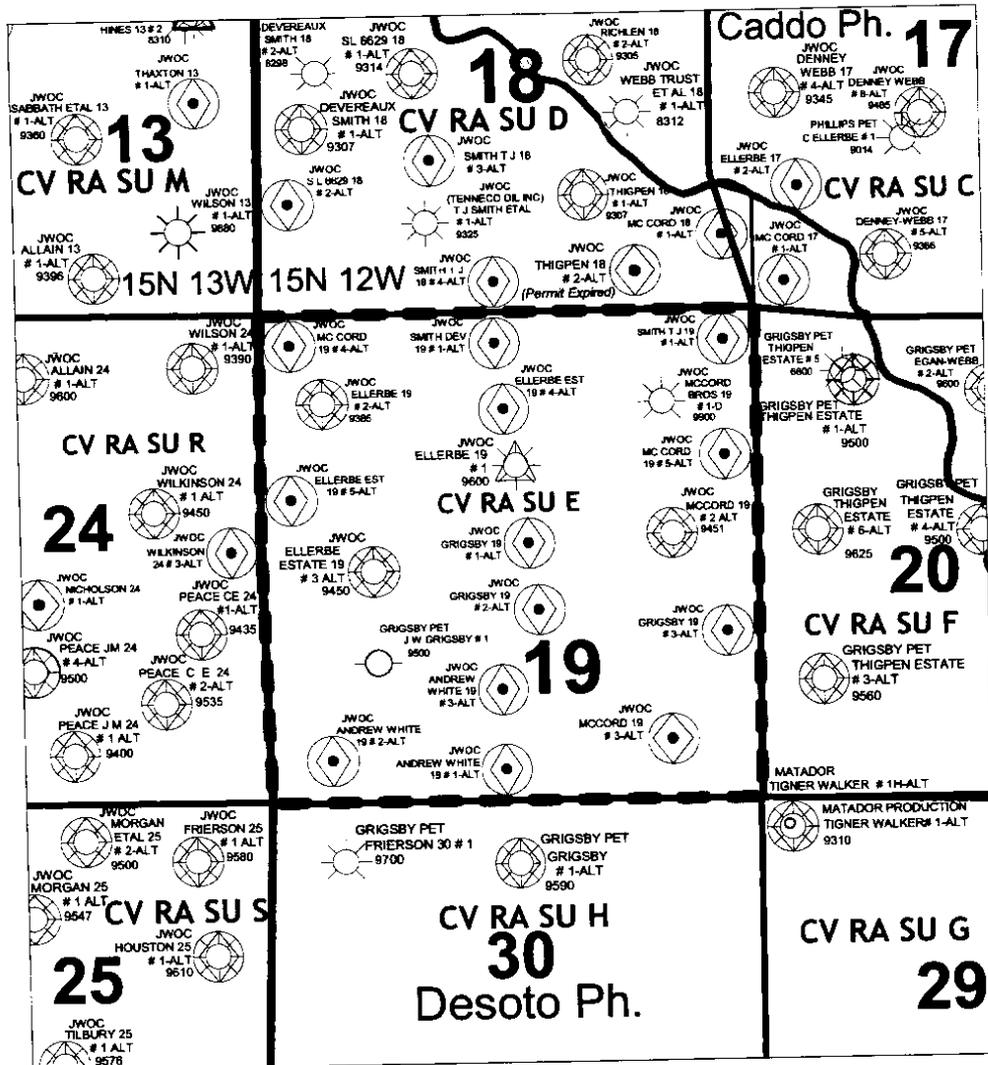
J.W. OPERATING COMPANY
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 DALLAS, TEXAS 75222-4406
 OFFICE: (972) 233-8191
 FAX: (972) 991-0704

CASPIANA FIELD
 Caddo & Desoto Phs., La.

PROPOSED REDEFINITION OF
HOSSTON ZONE

DATE:	Witness: Joe Adams	Docket No.
Exhibit 1	Scale: 1" = 2000'	10-??





LEGEND

- Existing Units 191-A Series
- Proposed Unit Redefinition
- Approved Alternate Unit Well Location
- Unit Well
- Alternate Unit Well
- Posted Wells < 10,000'

JW OPERATING COMPANY

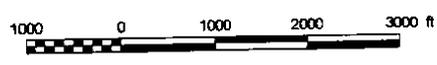
J-W OPERATING COMPANY
 P.O. BOX 224444
 DALLAS, TEXAS 75222-4404
 OFFICE: (972) 233-8191
 FAX: (972) 991-0704

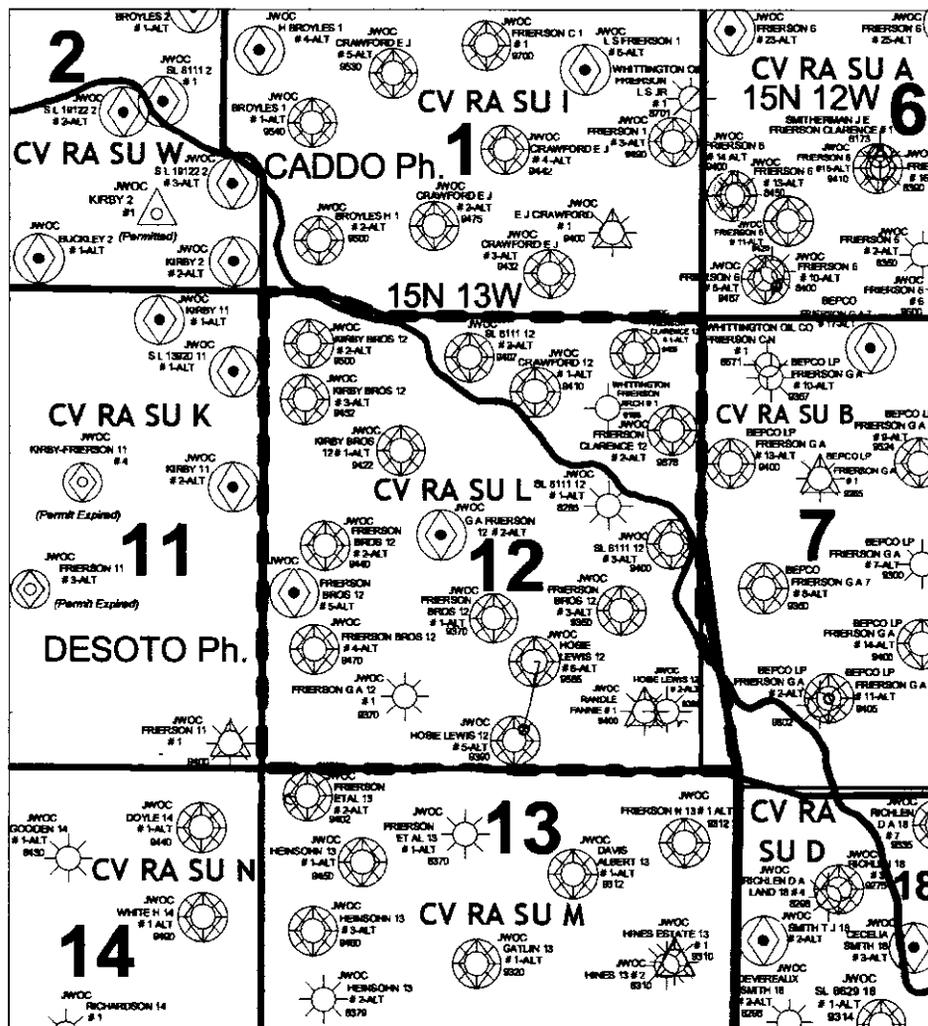
CASPIANA FIELD

Caddo & Desoto Phs., La.

PROPOSED REDEFINITION OF COTTON VALLEY FORMATION

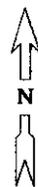
DATE:	Witness: Joe Adams	Docket No.
Exhibit 1	Scale: 1"=2000'	10-??





LEGEND

- Existing Units 191-A Series
- Proposed Unit Redefinition
- Approved Alternate Unit Well Location
- Unit Well
- Alternate Unit Well
- Posted Wells < 10,000'



JW OPERATING COMPANY

J-W OPERATING COMPANY
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 DALLAS, TEXAS 75222-6486
 OFFICE: (972) 243-8191
 FAX: (972) 991-0704

CASPIANA FIELD

Caddo & Desoto Phs., La.

PROPOSED REDEFINITION OF COTTON VALLEY FORMATION

DATE:	Witness: Joe Adams	Docket No.
Exhibit 1	Scale: 1"=2000'	10-??

