

# LISKOW & LEWIS

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April 21, 2011

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: Tuscaloosa Marine Shale, Reservoir A  
Ethel Field  
East Feliciana Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **DEVON ENERGY PRODUCTION COMPANY, L.P.** 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:

1. To establish rules and regulations and to create a single drilling and production unit for the exploration for and production of oil and gas from the Tuscaloosa Marine Shale, Reservoir A, in the Ethel Field, East Feliciana Parish, Louisiana, said unit to be designated TMS RA SUA, as shown on the plat attached hereto and made a part hereof.
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit with each tract sharing in unit production on a surface acreage basis of participation.
3. To provide that any future wells drilled to the Tuscaloosa Marine Shale, Reservoir A, within or outside of the unit created herein, should be located no closer than 330 feet from any unit line and no closer than 660 feet from any well on a competitive unit completed in, drilling to, or for which a permit has been granted to drill to the Tuscaloosa Marine Shale, Reservoir A; and to provide that horizontal wells drilled to the Tuscaloosa Marine Shale, Reservoir A, where the horizontal portion of the well is cased and cemented back above the top of the Tuscaloosa Marine Shale, Reservoir A, the distance to any unit boundary will be calculated based on the distance to the nearest perforations in the well, and not based on the penetration point or terminus.
4. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing if the producing



April 21, 2011

characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.

5. To consider such others matters as may be pertinent.

The Tuscaloosa Marine Shale, Reservoir A, in the Ethel Field, is hereby defined as being the stratigraphic equivalent of that oil and gas bearing zone encountered between the depths of 12,620 feet and 13,043 feet (electric log measurements) in the Oxy USA, Inc. – Richland Plantation A No. 1 Well (SN 215970) located in Section 69, Township 1 South, Range 2 East, East Feliciana Parish, Louisiana.

Any pertinent data, including well logs, not available from the Office of Conservation, may be obtained **AT THE COST OF THE REQUESTING PARTY** from Louis Gilbert & Associates, 3636 North Causeway Blvd., Suite 204, Metairie, LA 70002, Telephone Number (504) 834-8112.

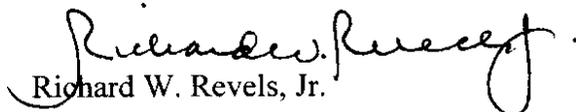
Pursuant to the Rules of Procedure, a pre-application conference was held on April 21, 2011, in Baton Rouge, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the unit being requested. Numerous questions were asked and answered. No counterplans were presented. The conference was adjourned.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal along, the conference attendance list, along with 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 mailed. Pursuant to the Revised Rules of Procedure, the 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 furnished 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, enclosed is our check in the amount of \$755.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Sincerely,

LISKOW & LEWIS

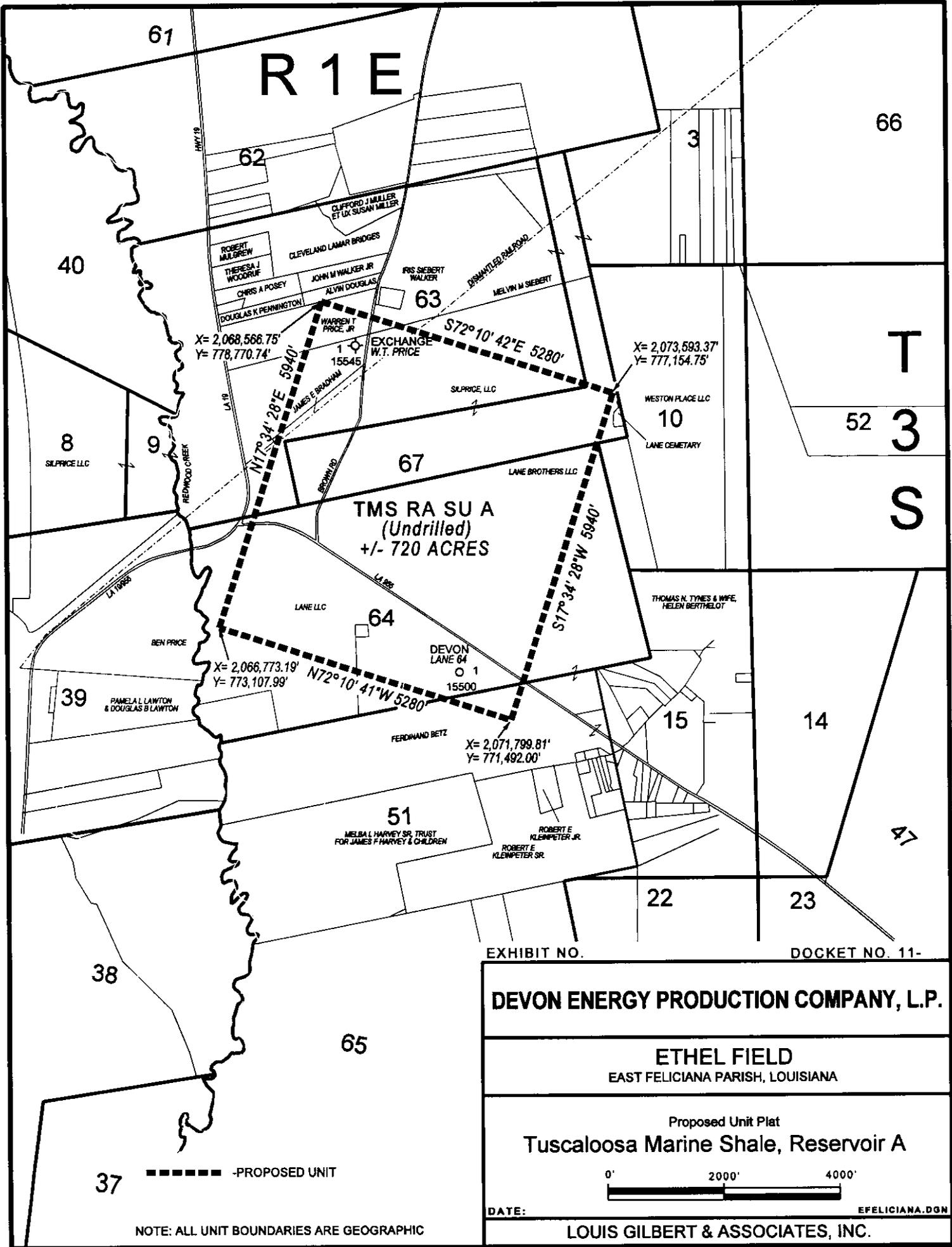
  
Richard W. Revels, Jr.

RWRjr:dbf

Attachments

288797\_1.Doc  
18192.0054

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



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TMS RA SU A  
(Undrilled)  
+/- 720 ACRES

EXHIBIT NO. DOCKET NO. 11-

**DEVON ENERGY PRODUCTION COMPANY, L.P.**

**ETHEL FIELD**  
EAST FELICIANA PARISH, LOUISIANA

Proposed Unit Plat  
**Tuscaloosa Marine Shale, Reservoir A**



DATE: EFELICIANA.DGN

**LOUIS GILBERT & ASSOCIATES, INC.**

NOTE: ALL UNIT BOUNDARIES ARE GEOGRAPHIC

37 - - - - - PROPOSED UNIT