

November 19, 2018

Honorable Richard Ieyoub
Commissioner of Conservation
Office of Conservation
PO Box 94275
Baton Rouge, LA 70804-9275

COUNTERPLAN

RE: Application of Cairn Energy Partners, LLC
Hearing Date: December 4, 2018
Docket No. 18-623
Thompson Bluff Field
Jefferson Davis Parish, Louisiana

Dear Commissioner Ieyoub:

On behalf of **Oleum Operating Company, L.C. ("Oleum")**, a counterplan is hereby filed as to the Application for public hearing made by Cairn Energy Partners, LLC ("Cairn") concerning the establishment of rules and regulations and the creation of a single drilling unit for the Nonion Struma Zone, Reservoir B, in the Thompson Bluff Field, Jefferson Davis Parish, Louisiana. The hearing scheduled upon Cairn's Application will be held on December 4, 2018, under Docket No. 18-623.

This is to advise that Oleum intends to present engineering and other evidence in support of the counterplan shown on the attached plat. As geological expert witness, I will be presenting evidence to support the referenced counterplan. Engineering evidence will be presented through Mr. Jim Veazey. The counterplan differs from the Cairn's plan in the following respects:

- 1) Oleum contends the Cairn – VUA; Quatre Minerals No. 1 well is completed in and producing from the Hackberry Zone, Reservoir A as defined in Office of Conservation Order No. 505-A (currently operated by Oleum), and is therefore proposing the unit as shown on the plat attached designated HBY RA SUB.

2) The Cairn unit proposal SIGNIFICANTLY OVERLAPS said unit order and the eastern boundary of the Cairn unit proposal has been identified/surveyed at a distance of 112.8 feet from the Oleum unit well for said unit order.

3) The location of the Cairn well bore is in violation of Statewide Order No. 29-E as it has been identified/surveyed at a distance of 122.9 feet outside of the exterior unit boundary of said unit order.

4) Lastly, Oleum is considering respectfully requesting a denial from the Commissioner of Conservation to Cairn's Nonion struma unit request due to the fact the Cairn well is located illegally as stated above and Oleum was not notified of this matter from the time of the original Cairn pre-application notice letter dated October 10, 2018.

There is attached hereto a plat reflecting the proposed unit in Oleum's counterplan. Lastly, copies of this counterplan are being furnished to the District Manager of the Lafayette Office of Conservation as well as Cairn's attorneys and consulting geologist.

Sincerely,



Bryan S. Groves
CONSULTANT GEOLOGIST
OLEUM OPERATING CO., L. C.

Cc: Mr. Pat Molbert

Mr. Matt Randazzo

Mr. Chris Bailey

Mr. David Comeaux

EXHIBIT NO.
DOCKET NO.

DATE:

OLEUM OPERATING COMPANY, L.C.

THOMPSON BLUFF FIELD

JEFFERSON DAVIS PARISH, LOUISIANA

PROPOSED UNIT

HACKBERRY SAND



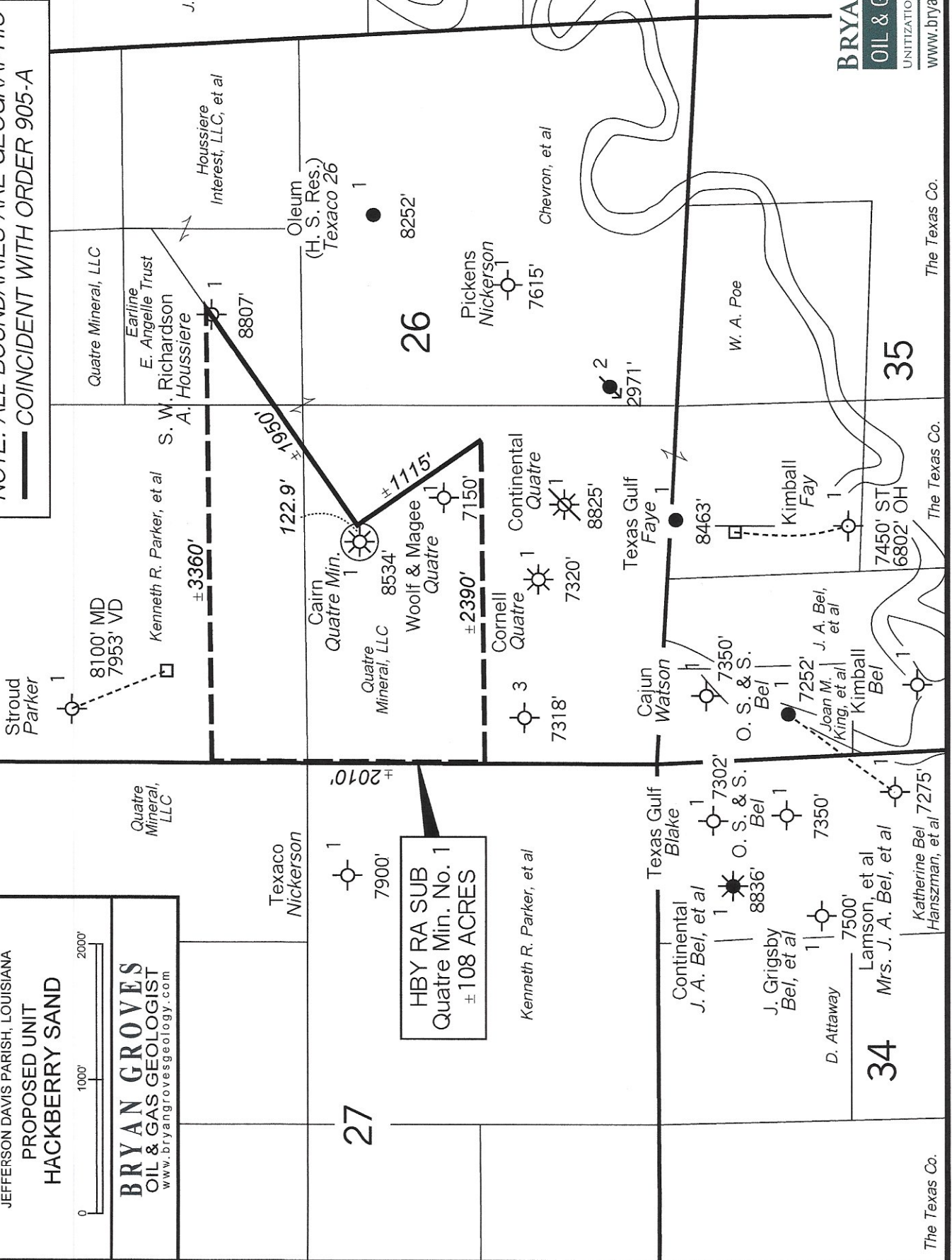
BRYAN GROVES
OIL & GAS GEOLOGIST
www.bryangrovesgeology.com

R 7 W
Larry Parker

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NOTE: ALL BOUNDARIES ARE GEOGRAPHIC
--- COINCIDENT WITH ORDER 905-A



HBV RA SUB
Quatre Min. No. 1
± 108 ACRES

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