BULLEN & PLAUCHE, L.L.P.

ATTORNEYS AND COUNSELORS AT LAW 130 S. AUDUBON BOULEVARD, SUIT 102 LAFAYETTE, LOUISIANA 70503 TELEPHONE (337) 237-5900 FAX (337) 233-9095 E-MAIL bullen@dbblaw.net

February 1, 2019

JAMES L. BULLEN

GEORGE C. PLAUCHÉ

NOTICE OF COUNTERPLAN

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

RE:

Application of Harrington, et al Hearing Date: February 19, 2019 CIB HAZ Sand, Reservoir A Docket No. 19-90

Holmwood Field

Calcasieu Parish, Louisiana

Dear Commissioner Ieyoub:

Excalibur Land Company, LLC ("Excalibur") participated in the pre-application conference related to the application of Harrington, et al ("Harrington"), held on October 3, 2018, and the pre-hearing conferences held on November 7, 2018, and December 20, 2018, as well as the pre-application conference of C6 Operating, L.L.C. related to its application for creation of a unit for the MARG-CAM Zone, Reservoir A, SUA, in the Holmwood Field on December 13, 2018. The public hearing regarding Harrington's application is scheduled on February 19, 2019, under Docket No. 19-90.

Excalibur hereby files the attached counterplan to the application of Harrington for the establishment of rules and regulations and the creation of a single drilling and production unit for the CIB HAZ Sand, Reservoir A, in the Holmwood Field, Calcasieu Parish, Louisiana. The counterplan shown on the attached plat differs from Harrington's plan as a result of a slightly different structural interpretation resulting in a proposed unit of approximately 48 acres. Excalibur will present geological evidence in support of the attached counterplan at the public hearing on Harrington's application.

Copies of this notice of counterplan are being furnished to the District Manager of the Lafayette District, Office of Conservation, the applicant, Harrington, et al, and to each of the parties named on the attached list, which includes all parties who attended the above described conferences. The aforesaid list is only being provided to the Commission of Conservation and the Honorable Richard Ieyoub February 1, 2019 Page 2

District Manager of the Lafayette District of the Office of Conservation. A copy of said list will be furnished to any party requesting it from the undersigned.

Very truly yours,

James L. Bullen

JLB/lbb Enclosures

cc: Mr. Pat Molbert, District Manager

(Copy of counterplan, List of Conference Attendees and Plat)

Harrington, et al, represented by David Sturlese (Copy of counterplan and Plat)

Interested Parties, Interested Owners, Represented Owners

