



Mike C. Wood
Manager - Reservoir Engineering

May 9, 2007

VIA HAND-DELIVERY

Mark E. Fesmire, P. E.
Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Application of Apache Corporation to amend the special rules and regulations for the South Eunice-San Andres Pool, Lea County, New Mexico.

Dear Mr. Fesmire:

Chesapeake Operating Inc. ("Chesapeake") wishes to express its strong support for Apache Corporation's application to amend the special rules and regulations for the South Eunice-San Andres Pool, Lea County, New Mexico. Apache seeks to amend the rules to allow for two wells to be located on each quarter-quarter section. Currently, the special rules allow for one well per quarter-quarter section in an 80-acre spacing unit.

Chesapeake is one of the largest operators in the South Eunice-San Andres Pool with approximately twelve wells producing or completed in this pool. To date the performance of our wells support the need for the special rules and regulations that are being considered.

Chesapeake believes that the granting of this application is in the best interest of conservation, will prevent waste and will protect correlative rights.

Thank you for your time and attention to this matter.

Sincerely,

Mike C. Wood
Manager - Reservoir Engineering
CHESAPEAKE OPERATING, INC.

cc: Jim Bruce

Oil Conservation Division
Case No. _____
Exhibit No. 5A