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"NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

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October 24, 2001

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Hand Delivery

Ms. Lori Wrotenbery, Director Oil Conservation Division 1220 S. Saint Francis Drive Santa Fe, New Mexico 87504

Re: Lawrence "32" Well No. 1
N/2SW/4 Section 32, T16S, R37E, NMPM
Application of Chesapeake Operating, Inc.
for an unorthodox oil well location,
Lea County, New Mexico

Case 12767

Dear Ms. Wrotenbery:

Yesterday, I filed the referenced application on behalf of Chesapeake who informs me that the footage from the west line should be 1909 feet instead of 1907 feet. Attached is a corrected application and advertisement.

W. Thomas Kellahin

cc: Chesapeake Operating, Inc. Attn: Lynda Townsend

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE APPLICATION OF CHESAPEAKE OPERATING, INC. FOR AN UNORTHODOX OIL WELL LOCATION, LEA COUNTY, NEW MEXICO

CASE: /2767

AMENDED APPLICATION

Comes now CHESAPEAKE OPERATING, INC. ("Chesapeake") by and through its attorney, James Bruce, and applies to the New Mexico Oil Conservation Division ("NMOCD") for approval to drill and produce its proposed Buchanan "32" Well-No. 1 at an unorthodox oil well location 2520 feet from the south line and 1909 feet from the west line (Unit K) of Section 32, Township 16 South, Range 37 East, NMPMP, for production from the Strawn formation from the Northeast Lovington-Pennsylvanian Pool to be dedicated to a standard 80-acre oil spacing and proration unit consisting of the N/2SW/4 of this section.

In support thereof, Applicant states:

- 1. Applicant, Chesapeake, is the proposed operator of the proposed Buchanan "32" Well No. 1 to be drilled at an unorthodox oil well location 2520 feet from the south line and 1909 feet from the west line (Unit K) of Section 32, Township 16 South, Range 37 East, NMPM, for production from the Strawn formation from the Northeast Lovington-Pennsylvanian Pool to be dedicated to a standard 80-acre oil spacing and proration unit consisting of the N/2SW/4 of this section.
- 2. This well location is subject to the Division's special rules for the Northeast Lovington-Pennsylvanian Pool which provide for 80-acre spacing and proration units and standard well locations within 150 feet of the center of a quarter/quarter section of the spacing unit.

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- 3. Chesapeake's geologic evaluation indicates that the optimum location for this well is at an unorthodox well location.
- 4. The well encroaches towards the S/2NW/4 of Section 32 in which there is no Strawn oil well. In accordance with the Division's notice rules, notice of this hearing is being sent to all of the working interest owners and unleased mineral owners in that 80-acre tract. See Exhibit "A"
- 5. Approval of this application will afford the applicant the opportunity to produce its just and equitable share of the gas underlying this unit, will prevent the economic loss caused by the drilling of unnecessary wells, avoid the augmentation of risk arising from the drilling of an excessive number of wells and will otherwise prevent waste and protect correlative rights.

WHEREFORE, Applicant requests that, after notice and hearing, this Application be approved as requested.

W. Thomas Kellahin, Esq.

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