



March 13, 2012

**VIA HAND DELIVERY**

Jami Bailey  
Oil Conservation Division  
New Mexico Department of  
Energy, Minerals and Natural Resources  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

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RECEIVED OGD

**Re: Application of Chesapeake Operating, Inc. for administrative approval of an unorthodox well location for its PLU Pierce Canyon 17 24 30 USA No. 1H well in the Bone Spring Pool Section 17, Township 24 South, Range 30 East, N.M.P.M., Eddy County, New Mexico.**

Dear Ms. Bailey:

Chesapeake Operating, Inc. (OGRID No. 147179) hereby seeks administrative approval pursuant to the provisions of Division Rule 19.15.15.13 NMAC for an unorthodox well location for its PLU Pierce Canyon 17 24 30 USA No. 1H well to be located in Section 17, Township 24 South, Range 30 East, N.M.P.M., Eddy County, New Mexico. The proposed wildcat well is to be drilled at a surface location 237 feet from the South line with a projected penetration point 330 feet from the South line and 1980 feet from the West line of Section 17. The bottom-hole location will be 100 feet from the North line and 1980 feet from the West line of Section 17. A 162.49-acre project area has been dedicated to this horizontal well comprised of the E/2 W/2 of Section 17.

**Exhibit A** is a land plat for Section 17 and surrounding sections that shows the proposed non-standard location of the PLU Pierce Canyon 17 24 30 USA No. 1H in relation to adjoining units and existing wells. This location is unorthodox because the Bone Spring formation under this acreage is governed by the Division's statewide rules which provide for wells on 40-acre spacing units to be located no closer than 330 feet to the outer boundary of the spacing unit. The bottom-hole location of this well will be located 100 feet from the North line of Section 17 for engineering reasons, and is, therefore, closer to the section line than allowed by Division rules.

**Exhibit B** is the Well Location and Acreage Dedication Plat (Form C-102), which shows that the proposed PLU Pierce Canyon 17 24 30 USA No. 1H well encroaches on the spacing and proration unit to the North.



**Exhibit C** is a list of the affected parties. Pursuant to 19.15.4.12(A)(2)(c) NMAC, affected parties are those toward whom the non-standard location encroaches. Here, the proposed bottom-hole location encroaches to the North. The affected working interest is BOPCO, LP. A copy of this application with all attachments was mailed to the notice recipient.

Your attention to this application is appreciated.

Sincerely,

Adam G. Rankin

ATTORNEY FOR CHESAPEAKE OPERATING, INC.

AGR

cc: David K. Brooks  
Monty Montgomery, BOPCO  
Teresa Long, Chesapeake Operating, Inc. w/o encls.



DISTRICT I  
1625 N. French Dr., Hobbs, NM 88240  
Phone (575) 593-8181 Fax: (575) 593-0720

DISTRICT II  
811 S. First St., Artesia, NM 88210  
Phone (575) 748-1283 Fax: (575) 748-0720

DISTRICT III  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone (505) 334-8170 Fax: (505) 854-0170

DISTRICT IV  
1220 S. St. Francis Dr., Santa Fe, NM 87508  
Phone (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals and Natural Resources Department

OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

Form C-102  
Revised August 1, 2011

Submit one copy to appropriate  
District Office

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

API Number	Pool Code 96403	Pool Name WILDCAT; BONE SPRING
Property Code	Property Name PLU PIERCE CANYON 17 24 30 USA	Well Number 1H
OGRID No. 147179	Operator Name CHESAPEAKE OPERATING CO.	Elevation 3307'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	17	24 S	30 E		237	SOUTH	1980	WEST	EDDY

Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	17	24 S	30 E		100	NORTH	1980	WEST	EDDY

Dedicated Acres 162.49	Joint or Infill	Consolidation Code	Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

<p>Project Area</p> <p>Producing Area</p> <p>3306.2'</p> <p>3324.8'</p> <p>3299.2'</p> <p>3307'</p> <p>1980'</p> <p>1980'</p> <p>3306.2'</p> <p>3324.8'</p> <p>3299.2'</p> <p>3307'</p> <p>Projected Penetration Point 330' FSL &amp; 1980' FWL</p>	<p><b>PROPOSED BOTTOM HOLE LOCATION</b></p> <p>Lot - N 32.224656588° Long - W 103.905757411° NMSPC E 445726.953 E 673557.268 (NAD-83)</p> <p>Lot - N 32.224533597° Long - W 103.905270641° NMSPC E 445668.016 E 632373.311 (NAD-27)</p>	<p><b>OPERATOR CERTIFICATION</b></p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the Division.</p> <p><i>Bryan Arrant</i> 02/17/2012 Signature Date</p> <p>Bryan Arrant Printed Name</p> <p>bryan.arrant@chk.com Email Address</p>
	<p><b>SURVEYOR CERTIFICATION</b></p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision and that the same is true and correct to the best of my belief.</p> <p>GARY L. JONES 2012 Date Surveyed</p> <p><i>Gary L. Jones</i> Signature &amp; Seal of Professional Surveyor</p> <p>Certificate No. Gary L. Jones 7977</p>	

EXHIBIT  
B

BASIN SURVEYS 26054

**EXHIBIT C**  
**Chesapeake's NSL Application**  
**PLU Pierce Canyon 17 24 30 USA No. 1H**

BOPCO, LP  
201 Main Street, Suite 3100  
Ft. Worth, TX 76102

**HOLLAND & HART** LLP



**Adam G. Rankin**  
Phone 505-988-4421  
Fax 505-983-6043  
agrarkin@hollandhart.com

March 13, 2012

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**TO AFFECTED PARTIES**

**Re: Application of Chesapeake Operating, Inc. for administrative approval of an unorthodox well location for its PLU Pierce Canyon 17 24 30 USA No. 1H well in the Bone Spring Pool Section 17, Township 24 South, Range 30 East, N.M.P.M., Eddy County, New Mexico.**

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date by Chesapeake Operating Co. for administrative approval of an unorthodox well location for its PLU Pierce Canyon 17 24 30 USA No. 1H. The proposed wildcat well is to be drilled at a surface location 237 feet from the South line with a projected penetration point 330 feet from the South line and 1980 feet from the West line of Section 17. The bottom-hole location will be 100 feet from the North line and 1980 feet from the West line of Section 17.

As an owner of an interest that may be affected by the proposed well, you may object to this application. Objections must be filed in writing within twenty days from this date at the Division's Santa Fe office that is located at 1220 South Saint Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application for an unorthodox well location may be approved.

Sincerely,

Adam G. Rankin  
**ATTORNEY FOR CHESAPEAKE OPERATING, INC.**

Enclosures

**Holland & Hart** LLP

Phone [505] 988-4421 Fax [505] 983-6043 [www.hollandhart.com](http://www.hollandhart.com)

110 North Guadalupe Suite 1 Santa Fe, NM 87501 Mailing Address P.O. Box 2208 Santa Fe, NM 87504-2208

Denver Aspen Boulder Colorado Springs Denver Tech Center Billings Boise Cheyenne Jackson Hole Las Vegas Salt Lake City Santa Fe Washington, D.C. ♻️