B. April.07

NSL

Attorneys At Law P.O. Box 2265 Santanial Aldress 7504-2265

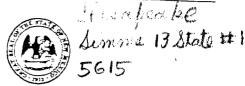
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE Application Acronyms: [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response] [1] TYPE OF APPLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Simultaneous Dedication NSL NSP SD R Check One Only for [B] or [C] Commingling - Storage - Measurement ☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS Injection - Disposal - Pressure Increase - Enhanced Oil Recovery WFX PMX SWD PPR EOR PPR \mathbb{D} Other: Specify [2] NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners BI Offset Operators, Leaseholders or Surface Owner Application is One Which Requires Published Legal Notice Notification and/or Concurrent Approval by BLM or SLO \mathbb{D} U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office E For all of the above, Proof of Notification or Publication is Attached, and/or. F Waivers are Attached [3] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE. CERTIFICATION: I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information and notifications are submitted to the Division. Note: Satement must be completed by an individual with managerial and/or supervisory capacity. Kellamin & Kellahin or Type Name Signature

KELLAHIN & KELLAHIN Attorney at Law

W. Thomas Kellahin 706 Gonzales Road Santa Fe, New Mexico 87501

TELEPHONE 505-982-4285 FACSIMILE 505-982-2047 TKELLAHIN@COMCAST.NET

April 17, 2007

HAND DELIVERED

Mr. Mark E. Fesmire, Director Oil Conservation Division 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: Administrative Application of Chesapeake Operating Company for an unorthodox oil well location,

Undesignated Bone Springs Formation Lea County, New Mexico

Dual Completion

Sims "13" State Well No. 1 (API # 30-025-37294)

Unit L Section 13, T20S, R35E, Lea County, New Mexico

Dedication: 320-acre, W/2 Section 13 for West Osudo Morrow Gas Pool Standard Gas Well Location: 1980 feet FSL and 1140 feet FWL

Dedication: 40-acre oil- Unit L (NW/4SW/4)

Unorthodox Oil Well Location for Bone Springs production

undissignated E Feathers Tone BS

24270

Dear Mr. Fesmire:

On behalf of Chesapeake Operating Company, please find enclosed our referenced administrative application seeking approval for the oil zone to be produced by this dually completed wellbore.

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.

ADMINISTRATIVE A P P L I C A T I O N

CHESAPEAKE OPERATING, INC. ("Chesapeake") by its attorneys, Kellahin & Kellahin, and seeks an order authorizing the production of its Sims "13" State Well No. 1 (API # 30-025-37294) as a dually completed wellbore at an unorthodox oil well location 1980 feet from the South line and 1140 feet from the West line (Unit L) of Section 13, Township 20 South Range 35 East, NMPM to be dedicate to a standard 320-acre gas spacing unit dedicated to production from Morrow formations and to a standard 40-acre oil well spacing unit dedicated to production from the Bone Springs formation

In support of its application Chesapeake states:

- 1. Chesapeake has permitted and drill its Sims "13" State Well No. 1 as a Morrow test in the West Osudo Morrow Gas Pool. The well was completed in such a way as to test both the Morrow formation and the Bone Springs formations. But in doing so, the Morrow will be a standard gas well location while the Bone Springs is be at an unorthodox oil well location. See Exhibit "A" locator map.
- 2. This wellbore is in Unit L (NW/4SW/4) 180 feet from the eastern boundary instead of the standard 330 feet thereby encroaching towards Unit M (NE4SW/4)
- 3. All of the W/2 of this section is within the same State of New Mexico oil and gas lease VB-0666 with Chesapeake owning 100% of the working interest ownership and therefore no notification in required.

NMOCD Application Chesapeake Oil Company -Page 2-

4. This spacing unit is subject Division Rule 104.

WHEREFORE, Chesapeake, as applicant, requests that the Division enter its order approving this requested unorthodox oil well location

RESPECTFULLY SUBMITTED:

W THÓMAS KELLAHIN KELLAHIN & KELLAHIN

706 Gonzales Road

Santa Fe, New Mexico 87504

Telephone: (505) 982-4285 Fax: (505) 982-2047 District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Ave., Artesia, NM 88210
District III
1000 Rio Branos Rd., Antec, NM 87410
District IV
1220 S. St Francis Dr., Santa Fe, NM
87505

State of New Mexico
Energy, Minerals and Natural Resources

Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505 Form C-102 Permit 12266

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Mumber	Pool Name	Pool Code	
30-025-37294	OSUDO;MORROW, WEST (GAS)	82240	
Property Code	Property Name	Well No.	
34862	SIMS 13 STATE	001	
OGRID No.	Operator Name	Elevation	
147179	CHESAPEAKE OPERATING, INC.	3660	

Surface And Bottom Hole Location

UL or Lot	Section 13	Township 20S	Range 35E	Lot Idm L	Feet From	N/S Lime S	Feet From 1140	E/W Line W	County Lea
	Dedicated Acres		Mil	Consolio	lation Code		Order 1	40.	

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	New Year		

OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Electronically Signed By: Brenda Coffman

Title: Regulatory Analyst

Date: 06/14/2005

SURVEYOR CERTIFICATION

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.

Surveyed By: Gary G Eidson Date of Survey: 05/11/2005 Certificate Number: 12641

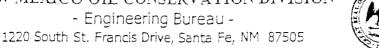


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KELLAHIN & KELLAHIN Attorney at Law

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ESPECTFULLY SUBMITTED

W-THÓMAS KELLAHIN KELLAHIN & KELLAHIN

706 Gonzales Road

Santa Fe, New Mexico 87504

Telephone: (505) 982-4285 Fax: (505) 982-2047 District I

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