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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 (6323)											
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] [A] Location - Spacing Unit - Simultaneous Dedication [M] NSL NSL NSP										
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		[E]	For	all of the above, P	roof of Notificati	on or Publication	n is Attached, a	nd/or,			
		[F]	🗌 Wa	ivers are Attached							

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[3] SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.

[4] **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: Statement must be completed by an individual with managerial and/or supervisory capacity.

Ocean Munds	.Dry	Quar n	Nunds-Dy	getter n	LY	1-12-11
Print or Type Name	\mathcal{I}	Signature	,	Title	J	Date
				omund so e-mail Address	dryghollan	<u>dhart.com</u>



Ocean Munds-Dry omundsdry@hollandhart.com

January 12, 2011

HAND-DELIVERED

Daniel Sanchez Acting 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 Chesapeake Operating, Inc. for administrative approval of an unorthodox well location for its PLU Ross Ranch "20" Federal Com Well No. 1H to be drilled from a surface location and penetration point 100 feet from the North line and 400 feet from the West line and a bottomhole location 330 feet from the South line and 400 feet from the West line of Section 20, Township 25 South, Range 30 East, NMPM, Eddy County, New Mexico.

Dear Mr. Sanchez:

Chesapeake Operating, Inc. ("Chesapeake") hereby seeks administrative approval pursuant to the provisions of Division Rules 19.15.15.13 and 19.15.16.14 for an unorthodox well location for its PLU Ross Ranch "20" Federal Com Well No. 1H. This well is located in Section 20, Township 25 South, Range 30 East, N.M.P.M., Eddy County, New Mexico and is to be drilled in the Bone Spring formation at a surface location and a penetration point 100 feet from the North line and 400 feet from the West line and a bottomhole location 330 feet from the South line and 400 feet from the West line of Section 20, Eddy County, New Mexico. A 160-acre project area has been dedicated to this horizontal well comprised of the W/2 W/2 of Section 20.

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. Division Rule 19.15.16.14 defines the "Penetration Point" as "the point where the wellbore penetrates the top of the pool from which it is intended to produce." The wellbore penetrates the Bone Spring formation at a point 100 feet from the North line of Section 20 and is therefore closer than allowed by Division rules.

Phone [505] 988-4421 Fax [505] 983-6043 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. 3



Although the wellbore penetrates the top of the Bone Spring at an unorthodox location, the well will be at a standard location at the producing interval. Chesapeake is targeting the Lower Avalon Shale at approximately 7970 feet (TVD). Therefore, once Chesapeake reaches the targeted formation, it will be at a standard location.

Exhibit <u>A</u> is a plat showing the location of the well. This location is encroaching to the north of Section 20. This location is within the Poker Lake Unit which is operated by BOPCo., LP. A copy of this application with all attachments was mailed to BOPCO., LP and advised that if they have an objection to this application it must be filed in writing with the Division's Santa Fe office within twenty days from the date notice was sent. They were also advised that if no objections were received by the Division within twenty days, the Division Director could approve the application.

Exhibit B is the C-102 for this well.

Exhibit C is the notice list.

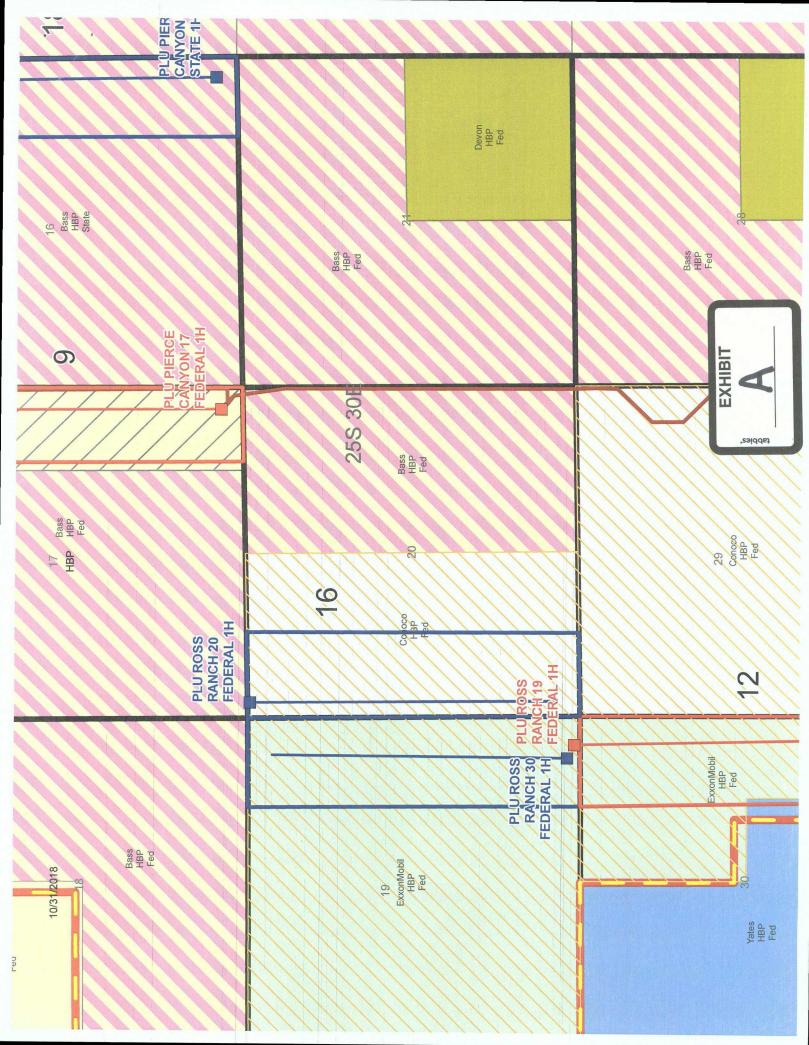
Your attention to this application is appreciated.

Sincerely,

Ocean Munds-Drv

ATTORNEY FOR CHESAPEAKE OPERATING, INC.

Enclosures cc: OCD District Office



DISTRICT I. 1825 H. French pr.: 165bs, 161 68249 DISTRICT II 1301 W. Grand Avenue, Artesia, 101 68310

DISTRICT III 1000 Rio Diazos Rd., Aztec, NM 07410

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DISTRICT IV

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 October 15, 2009

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Submit one copy to appropriate District Office

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<u>Exhibit C</u> Chesapeake's NSL Application PLU Ross Ranch "20" Fed Com Well No. 1H

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BOPCo., LP 201 W. Main Street Suite 3100 Fort Worth, Texas 76102

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