' L							PTG-U	4]			
DATE IN	17-1)	SUSPENS	E	ENGINEER, DLB	LOGGED IN /-13-	IU INS	and the second s		72150		
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										
		Check [B]	Commir	/ for [B] or [C] ngling - Storage - M IC [] CTB []	2011 JAN						
		[C]		n - Disposal - Press FX 🔲 PMX 🚺				AN 12	RECEIVED OCL		
		[D]	Other: S	pecify				υ	00		
[2]	NOTIF	ICATI [A]		UIRED TO: - Cho orking, Royalty or C				э ГЧ	S		
		[B]	Off	set Operators, Leas	scholders or Surfa	ace Owner					
		[C]	Apj	plication is One W	hich Requires Pu	blished Legal No	otice				
		[D]	Not U.S. E	tification and/or Co Bureau of Land Management	ncurrent Approv - Commissioner of Public	al by BLM or SI Lands, State Land Office	.0				
		[E]	For	all of the above, P	roof of Notificati	on or Publication	n is Attached, a	nd/or,			
		[F]	🗌 Wa	ivers are Attached							

۹

## [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.

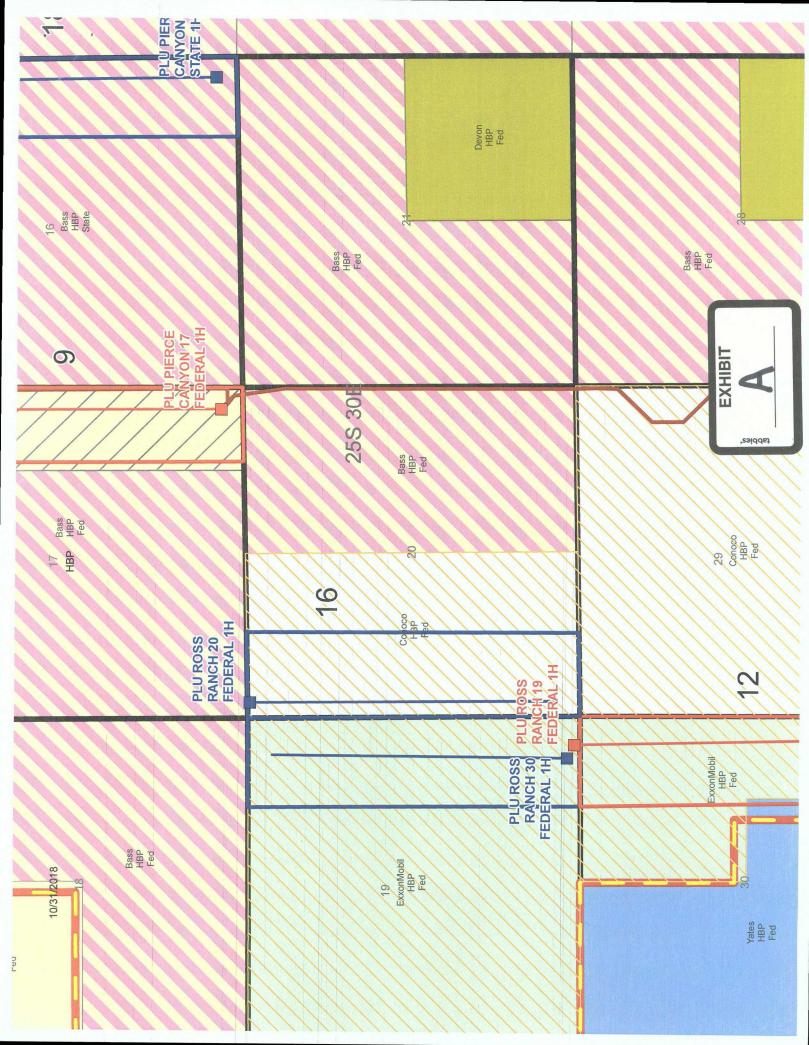
Your attention to this application is appreciated.

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

.....

÷\*

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

.

Submit one copy to appropriate District Office

1220 5. St. Francis D	r,, Sinta Pe,		WELL LO	CATION	AND ACREA	GE DEDICATI	ON PLAT	□ AMENDED	REPORT	
80-015	Number - 38.	357	.1335	Pool Code	ime	les	Pool Name			
Property (			<u></u>	<u> </u>	Property Nam	· ·	0-; Done )	Then Nu	imber	
·			PLU ROSS RANCH "20" FEDERAL					1H		
OCRID No. 147179			Operator Name CHESAPEAKE OPERATING CO.			Elevation 3199'		-		
147179	1 - 2 <sup>1</sup> 21 - 4 1		i	CHESA			<u></u>	010	<u> </u>	
UL or lot Ho.	Section	Township	Range	Lot Idn	Surface Loc	North/South line	Feet from the	East/West line	County	
D	20	25 S	30 E	For Int.	100	NORTH	400	WEST	EDDY	
	20	20 0	<u></u>	Hole In	Ç <del>, , , , , , , , , , , , , , , , , , , </del>	rent From Sur	<u> </u>	1		
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/Weat line	County	
M	20	25 S	30 E		330	SOUTH	400	WEST	EDDY	
Dedicated Acres	Joint o		nsolidation	Code Or	der No.		L	L	نى <u>تىمەر</u> مەر	
160						·				
NO ALLO	WABLE W	TILL BE AS	SSIGNED	TO THIS	COMPLETION U	UNTIL ALL INTER	RESTS HAVE BI	EEN CONSOLIDA	ATED	
197.4 3202.	5'			DARD UN	IT HAS BEEN	APPROVED BY	THE DIVISION			
400	_/1.	Felletint	ion Point <u>-</u> k	· · · · · · · · · · · · · · · · · · ·		······································	OPERATO	OR CERTIFICAT	NOI	
		SURFACE		1						
197.7 3202	.7	Long - W 10	2.12258464* 3.9107995* 408587 817	 	1		contained here the best of my	in is true and comp knowledge and bellef	lete to and that	
	7	NMSPCE- H (HAD-I		1			this organization	a silder owns a work ased mineral interest	king King the hole	
i 1		(0) <del>-</del>	,			×.	location or has this location pe	rify that the inform in is true and comp. knowledge and billed in sither ours a work last dimineral interest the proposed boltom i a right to drill the rewant to a controot a mineral or working ry pooling warement ling order herebyers.	will at with an	
				1			owner of such or to a volunta	a mineral or working ry pooling agreement Reg order bereinford	er a i	
	• •• • •			+			- the division.	A	••••••••	
					1		Bry	an Aug 106	/09/2010	
	1			1	ļ		Signature		Date	
				1	1		Bryan Arran	<u>it</u>		
1 12 5				1	1		Printed Nam	ic		
Producing Arca		ម្ម					Guinunit	SURVEYOR CERTIFICATION		
		Project Arca					- SURVEY	JR CERTIFICAT	1014	
1 Per		roje	I hereby certify that the well t on this plat was plotted from:							
		и					actual surveys made by me or under my supervisor, and that the same is true and			
								id that the name is a best of my belie		
				) 1	1			and a los		
1	1						Data Survey	AN HEXICO	<u>}</u>	
	·			-		ښې وله د وله وله وله			N	
		PROPOSED	ROTION	1	1 - E		Professional	Burryeyor	ġIJ	
	1	HOLE LO	CATION 2 10915696'	1	1			1 Stall	W	
		Long - W 10 NMSPCE- N	3.9107945		 				/	
RHI.		(NAD-	672167.020 83)		·		785	22910:424.918		
400	_			1   .	1		Certificate N	o. Gary L. Jones	7977	
			<del> </del>	۱، ۱.	<u> </u>		B	ASIN SURVEYS		
							<u> </u>	····		
					EXHIBIT					
		-		labbies"	2	ſ				
				ta ta						
						- I				

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

-

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

. . . .

• . . .