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May 28, 2010

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

Case 14506

**RE: Application of Chesapeake Operating, Inc.
Unorthodox well - Skeen "21" State Well #1H
Section 21, T-26S, R-28E, Eddy County, New Mexico**

Dear Mr. Fesmire:

Marbob Energy Corporation objects to the proposed unorthodox location described above.

Marbob Energy Corporation has reviewed the application and notice provided and can find no rational reason as to why an orthodox location was not selected. We recognize that there may be significant issues which could have caused this application, and that Chesapeake will struggle with why we object given their plan to only perforate intervals in the horizontal section that are orthodox. Our concern is that later they may want to perforate sections in the curve or the vertical wellbore and your standard approval might grant that. Additionally, a recompletion in the Delaware might be considered in the future and the OCD has usually looked more favorable for those types of issues because of the prevention of waste.

Marbob Energy Corporation would waive its objection if the OCD approval of this location was contingent on all production being from orthodox perforations and that no preference would be given for any unorthodox

recompletion in the future because of the existing well bore. That future application would be considered on its merits as if the well bore did not exist.

If you have any questions regarding this objection, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Raye Miller".

Raye Miller
Land Department

RM/mm

cc: Oceans Munds-Dry
Holland and Hart