Re: Cases 144477 and 78 Chesapeake's Chambers Strawn Unit and Waterflood

Hello Will,

We have reviewed the concern you have for the exclusion of the nearby Chambers 2 well from the Chambers Strawn unit and your concern with the possible inclusion of portions of the Atoka into the Unitized Formation. A review of our thoughts on the exclusion of the Chambers 2 is presented below; we continue to believe that separation of the Chambers 2 is the best approach in unitizing this mound.

We considered the possibility of placing the Chambers 2 well into the Chambers Unit but concluded that the Chambers 2 was in a separate mound and did not have effective pressure communication with our proposed mound. Two items lead to this conclusion: seismic interpretation and well performance.

Chesapeake has extensive three-dimensional (3D) seismic in this area and has utilized 3D interpretation since the mid-90s to guide drilling. During this period Chesapeake has been the most active driller in the mound area and, to my knowledge, has drilled no well that has not hit its intended mound. We, therefore, have high confidence in the 3D interpretations. The 3D seismic interpretation, augmented with well data, for the Chambers mound was presented at the hearing, in the proposed Chambers Strawn Unit's feasibility study as attachment 9, and is attached here for your convenience. The Strawn mound containing the Chambers 2 well was not presented in our exhibits. However, I have attached a phi-h isopach map derived from the seismic interpretation and well data. It shows a 40ft thick reservoir of about 70 acres containing two wells, the Chambers 1 and Chambers 2. The interpretation shows that each of the two mound have steeply dipping sides that approach or reach zero thickness resulting in two separate mounds.

Well performance supports the concept of separate mounds. The first well drilled in this area was the Chambers 1, which came on March 1974 with virgin pressure and a first month rate of 506 BOD and 868 McfD. This well's estimated ultimate recovery (EUR) is 443.908 BO and 1,104,130 Mcf; it has been a very strong well. The second well, the Chambers 7-1, was drilled 22 years later. It also came on with virgin pressure; it had a first month rate of 415 BOD and 733 McfD. This well's EUR is 529,950 BO and 1,853,355 Mcf, also a very strong well. The behavior of these wells indicates that they are in separate mounds with no pressure communication. The proposed Chambers Strawn Unit mound had the Alston 8-1 drilled in the next seven months and the Runnels 8-1 drilled 10 months later. Each well came on with lower pressure and lower rate and smaller EURs, as detailed in the "Well, Reservoir Data" attachment 5 to the Feasibility Study, and attached here for convenience. These wells indicate the continuous nature that exists within the mound and leads to the belief that these three wells are pressure communicated within the same mound. The Chambers 2 was the last well drilled in this area. The Chambers 2 started production September 2003 with initial monthly production averaging 75 BOD and 95 McfD with an EUR of 51,460 BO and 58,949. This is the weakest well in the area; it had clearly suffered pressure depletion and is

only 1436 ft. from the Chambers 1. We believe that well and mound performance add to the credibility of the concept of two separate mounds.

Chesapeake has extensive geophysical modeling in the Strawn mounds; we believe the model has been validated by many successful wells and we have high confidence in these interpretations. We believe the interpretation of two separate mounds is the best explanation of all the seismic, wellbore and performance data available and this interpretation is most likely to protect correlative rights of working and mineral owners.

We agree with your concern with the descriptive language of the Unitized Formation. The Atoka is not the focus of this secondary recovery unit and to insure that none of the Atoka is included in the description of the Unitized formation we propose the following:

> "Unitized Formation" is defined as that stratigraphic interval occurring between a point of 100 feet above the Strawn Carbonate formation and the base of the Strawn Carbonate formation, said Strawn Carbonate interval occurring in the following Chesapeake Operating, Inc wells: between 11442 feet and 11738 feet (-7490 feet to -7786 feet subsea) in the., Runnels "8" well No. 1 (API No. 30-025-34264) located 780 feet from the South line and 1510 feet from the West line of Section 8, Township 16 South, Range 36 East, the Alston "8" No. 1 (API No. 30-025-33876) between 11,422 feet and 11,706 feet (-7,463 feet and 7,747 feet subsea) located 2.281feet from the South line and 531feet from the west line of Section 8, Township 16 South, Range 36 East, and the Chambers "7" No. 1 well (API No. 30-025-33623) between 11,376 feet and 11,660 feet (-7459 feet and -7,743 feet subsea) located 1,700 feet from the North line and 900 feet from the east line in Section 7, Township 16 South, Range 36 East N.M.P.M., Lea County, New Mexico as recorded on the sonic log of said well dated March 3, 1998.

Will, we hope the suggested language of the Unitized formation clarifies and constrains the Unitized formation to the Strawn formation and that the discussion and additional map adds to your understanding of our thoughts on separating the Chambers 2 from the proposed Chambers Strawn Unit. Please let us know if there are additional concerns.

Sincerely.

Chima Nzewunwah Geologist Cheeqpeake Operating, Inc

Everett Bradley

Sen. Reservoir Engineer Chesapeake Operating, Inc.

Proposed Chambers Strawn Unit



Attachment 9

Proposed Chambers Strawn Unit

Isopach Map of Mound Containing Chambers 1 and Chambers 2 This mound is just southwest of the Proposed Chambers Strawn Unit Map is based upon interpretation of 3-D Seismic data and Well Log data



	Rate	es							
	1st Mnth	Present							
Chambers 1 Chk Operates	506 BOD	6 BOD	17,296	BO &	55567	M	26,557	BOE	Reserve
First Production Mar 1994	868 Mcf	20 Mcf	426,618	BO &	1048527	Μ	601,373	BOE	Cumulative
17 year life remaining.	651 BOE	9 BOE	443,914	BO &	1104094	M	627,930	BOE	Est. Ult. Rec.
Chambers 2 Chk Operates	75 BOD	11BOD	3,631	BO &	7,041	M	4,805	BOE	Res
3 year life remaining.	95 Mcf	22 Mcf	37,332	BO &	49,126	M	37,332	BOE	Cum
	91 BOE	15 BOE	40,963	BO &	56,167	M	40,963	BOE	eur

Attachment 5

**Saturations in this table are the geometric mean from net pay log values. Average saturations in the reservoir, determined from the hydrocarbon pore volume map, are 34% water and 66% oil.

Chambers 7 No. 1 had pressure transient test in August 23, 2001 with all pay perforated which showed permeability

Proposed Chambers Strawn Unit

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	Chambers 7 No. 1	Alston 8 No. 1	Runnels 8 No. 1	Averages
tt Prod Pl JR Oil JR Gas itial GOR erfs	Nov-96 3002533623 529,950 BO 1,853,355 Mcf 1.1 Mcf/Bbl 11,392' - 11,480'	May-97 3002533876 157,324 BO 541,504 Mcf 1.7 Mcf/Bbl 11,444' - 11464'	Mar-98 3002534264 89,265 BO 531,910 Mcf 11,458'-60' 11,476'-94'	258,846 BO 975,590 Mcf 1.33 Mcf/Bo 11,392' top 11,494' bottom
ST Interval il Gravity HP erm.	11,392'-404' 43.20 °API 4,224 Psi @ 11,376' 7.97 md	11,438' - 11,483' 44.70 °API 3,474 Psi @ 11,416' 6.39 md	No DST	DST data 3 wells 43.95 °API 7.18 md
$ \begin{array}{l} f_{i} \left(\varphi \geq 6\% \right) \ (ft) \\ \widehat{a} \ above \ O/W \ Contact \\ \varphi \ (frac.) \ above \ O/W \\ S_{w} \ (frac.) \ in \ net \ pay \\ S_{o} \ (frac.) \ in \ net \ pay \\ \beta_{oi} \ (bbl/bbl) \end{array} $	100 85 0.0865 0.265 0.735 1.4512	110 68 0.0765 0.215 0.785 1.4587	42 22 0.0988 0.331 0.669	0.087 Ανg . φ 0.270 Ανg. S. ^w . 0.730 Ανg. S. ^w . 1.455 Ανg. βοi

of 7.97 md.