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NATURAL RESOURCES-OIL AND GAS LAW

W THOMAS KELLAHIN

September 29, 2000

TELEPHONE (505) 982-4285 TELEFAX (505) 982-2047

Via Facsimile and Federal Express

Mr. Chris Williams, Supervisor Oil Conservation Division 1625 N. French Drive Hobbs. New Mexico 88240

Re:

Shelby "14" Well No. 1

Administrative Application of Chesapeake Operating, Inc., for a Directional Wellbore W/2 Section 14, T16S, R36E Unorthodox Surface Location: 577 feet FWL x 1299 feet FNL Standard Subsurface Location: 1684 feet FWL x 660 feet FNL

Lea County, New Mexico

Dear Mr. Williams:

On behalf of Chesapeake Operating, Inc. and in accordance with our phone conversation this morning, please find enclosed the enclosed original "APD" for approval to drill this well directionally from an unorthodox surface location to a standard subsurface location and appropriate attachments.

Chesapeake intends to drill the well to the top of the Lower Mississippi formation in order in insure that it has penetrated the full extent of the Morrow formation which is the primary objective. If the Morrow is unsuccessful, then they will see if there is any opportunity to produce the Atoka formation.

Chesapeake would like to commence drilling this well on Monday, October 2, 2000. Please call me if you have any questions.

cfx: Chesapeake Operating, Inc.

Attn: Lynda Townsend

ELF

ABOVE DATE DOES NOT INDICATE WHEN CONFIDENTIAL LOGS