

KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

October 5, 2001

W. THOMAS KELLAHIN*

*NEW MEXICO BOARD OF LEGAL SPECIALIZATION
RECOGNIZED SPECIALIST IN THE AREA OF
NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

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FEDERAL EXPRESS

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

Re: Buddy "9" Well No. 1
Application for Permit to Drill
Chesapeake Operating, Inc.
Unit K Section 9, T16S, R37E
Lea County, New Mexico

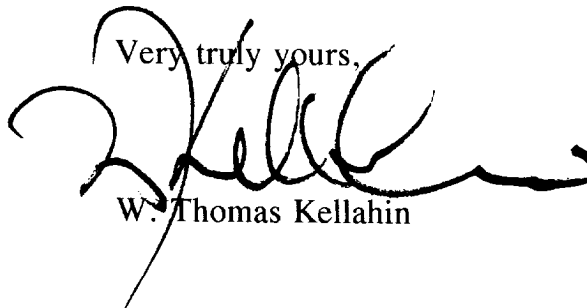
Dear Mr. Williams:

On behalf of Chesapeake Operating, Inc. and at their request, I have reviewed and now forward for your processing the enclosed application for approval to drill this well.

You will note that the APD incorrectly indicates the NE Loving Strawn Pool. My research indicates that the Strawn formation at this location is a standard well location and is subject to the Northeast Lovington Pennsylvanian Pool which is governed by special rules including 80-acre units.

Please call me if you have any questions.

Very truly yours,



W. Thomas Kellahin

cc: Chesapeake Operating, Inc.
Attn: Lynda Townsend
phone (405) 848.8000 (ext 414)