

JOSEPH ONEBANE (1917-1987)
JOHN G. TORIAN, II (1936-1991)

TIMOTHY J. MCNAMARA
EDWARD C. ABELL, JR.
LAWRENCE L. LEWIS, III †
DOUGLAS W. TRUXILLO *
RANDALL C. SONGY
MICHAEL G. DURAND
GREG GUIDRY *
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July 16, 2009

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LL.M. IN TAXATION
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* ALSO ADMITTED IN TEXAS
** ALSO ADMITTED IN MISSISSIPPI

7097-69696

VIA EMAIL AND FEDERAL EXPRESS MAIL

Mr. Todd Keating
Louisiana Office of Conservation
617 North Third Street
Baton Rouge, LA 70802

Re: Haynesville Zone, Reservoir A
Red River-Bull Bayou Field
DeSoto Parish, Louisiana

Dear Mr. Keating:

Pursuant to Rule 8 of the Rules of Procedure, a request is hereby made on behalf of **CHESAPEAKE OPERATING, INC.** to authorize it to file for a public hearing related to the creation of one (1) drilling and production unit for the captioned reservoir, and waiving the twenty (20) day pre-application notice requirement as set forth in Rule 3 of the Rules of Procedure.

It is suggested that the twenty (20) day pre-application notice requirement would unduly extend the date of the hearing and issuance of the unitization order, resulting in an undue hardship to Chesapeake and it is respectfully requested that, pursuant to Rule 8, you authorize the filing of the application by Chesapeake and the waiver of such pre-application notice. Attached hereto is a plat reflecting the mineral lease which will expire on or about September 23, 2009, if this request is denied.

Please schedule the hearing for this application on August 25, 2009, if at all possible, so as to allow for the possibility of the issuance and recordation of an order on or before September 23, 2009. If that date is not available, please schedule the hearing on the earliest available hearing date.

July 16, 2009
Page 2

If this request meets with your approval, please notify the undersigned at your earliest convenience.

Yours truly,


RANDALL C. SONGY

RCS/smp

Enclosure

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July 16, 2009

APPLICATION

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7097-69696

Honorable James H. Welsh
Commissioner of Conservation
Louisiana Office of Conservation
617 North Third Street
Baton Rouge, LA 70802

Re: Haynesville Zone, Reservoir A
Red River-Bull Bayou Field
DeSoto Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **CHESAPEAKE OPERATING, INC.** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of orders pertaining to the following matters relating to the **Haynesville Zone, Reservoir A**, in the **Red River-Bull Bayou Field**, DeSoto Parish, Louisiana, for which rules and regulations were established and a pattern of drilling and production units was created by Office of Conservation Order No. 109-X-2, effective August 19, 2008, as amended and supplemented by certain Orders of the 109-X Series of Orders, to-wit:

1. To create one (1) additional drilling and production unit for the exploration for and production of gas and condensate from the Haynesville Zone, Reservoir A, such unit to be designated HA RA SUHH;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;

3. To designate Chesapeake Operating, Inc. as the operator of, and a unit well for the proposed unit, if appropriate;
4. That with respect to horizontal wells drilled to the Haynesville Zone, Reservoir A, in the proposed unit, where the horizontal portion of the well is cased and cemented back above the top of the Haynesville Zone, Reservoir A, the distance to any unit boundary and any offset wells(s) should be calculated based on the distance to the nearest perforation in the well, and not based on the penetration point or terminus;
5. To extend to the proposed unit, to the extent not inconsistent herewith, all pertinent provisions of Office of Conservation Order No. 109-X-2, effective August 19, 2008, as amended and supplemented by certain Orders of the 109-X Series of Orders, and all applicable Statewide Orders; and
6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Haynesville Zone, in the Red River-Bull Bayou Field, DeSoto Parish, Louisiana, was fully defined in Office of Conservation Order No. 109-X, effective June 25, 2008.

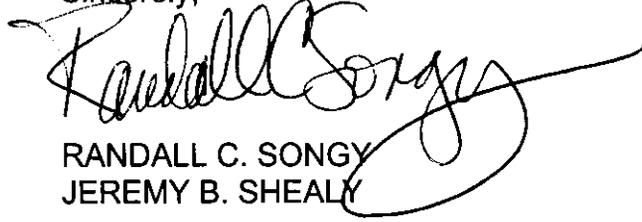
Pursuant to Rule 8 of the Rules of Procedure, the Commissioner of Conservation has waived the pre-application notice requirement. **A conference to discuss the proposed application is hereby scheduled for Thursday, August 6, 2009, at 1:30 p.m., at the Petroleum Club of Shreveport, 416 Travis St., #1500, Shreveport, LA 71101, (318) 425-4521.**

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting David Comeaux, Leon Comeaux & Associates, P.O. Box 53922, Lafayette, LA, 70505, (337) 233-9839.

There is attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Shreveport District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$755.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Sincerely,



RANDALL C. SONGY
JEREMY B. SHEALY

RCS/JBS/smp/fsc
Enclosure

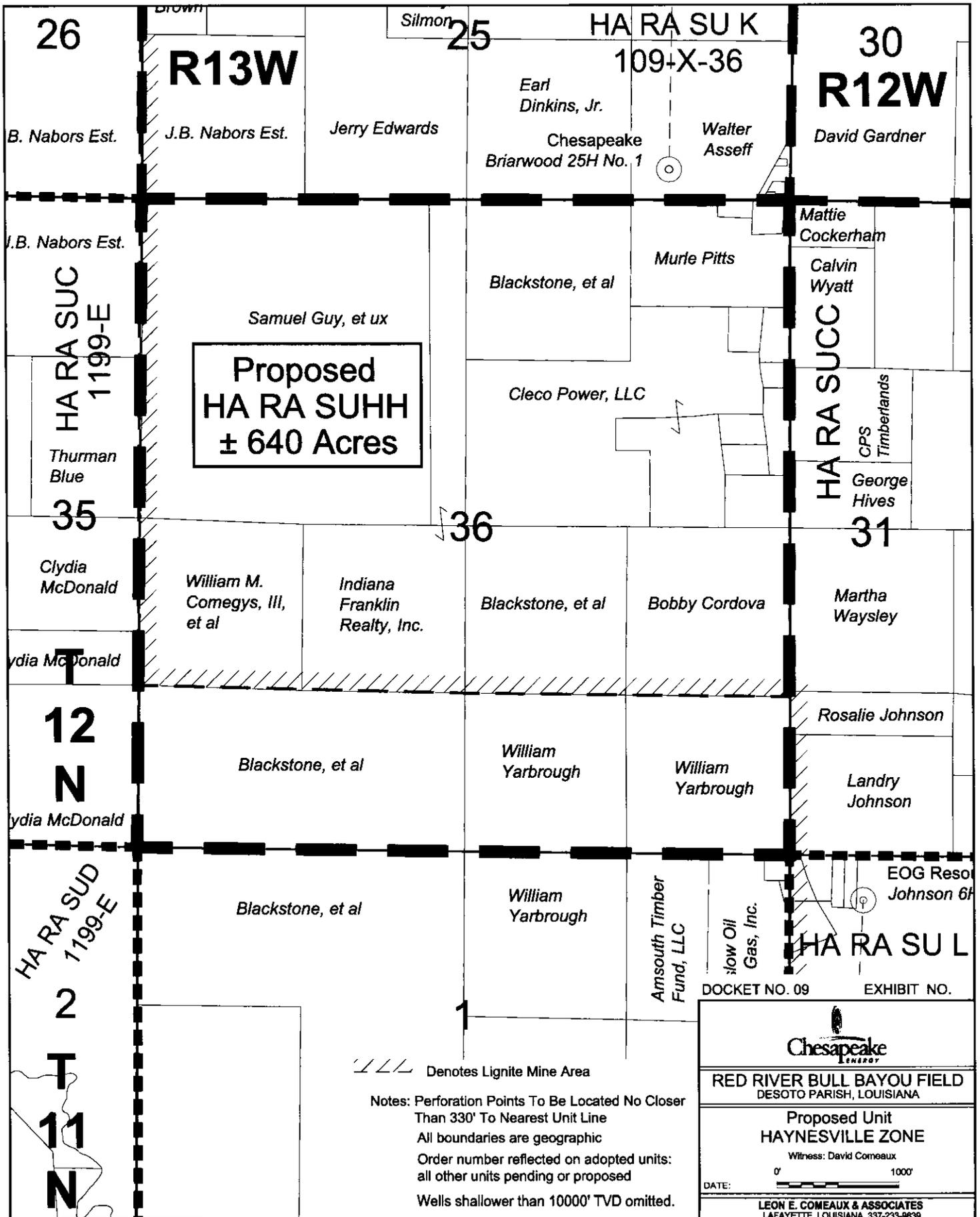
Interested Owners, Represented Parties and
Interested Parties

Jim Broussard, District Manager
Office of Conservation

P.S. To all Interested Owners, Represented Parties and Interested Parties:

You may have received this Application even though your property is not included in the proposed unit, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed unit.

Your receipt of this Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.



**Proposed
HA RA SUHH
± 640 Acres**

////// Denotes Lignite Mine Area

Notes: Perforation Points To Be Located No Closer Than 330' To Nearest Unit Line
 All boundaries are geographic
 Order number reflected on adopted units: all other units pending or proposed
 Wells shallower than 10000' TVD omitted.

DOCKET NO. 09 EXHIBIT NO.

Chesapeake
ENERGY

RED RIVER BULL BAYOU FIELD
DESOTO PARISH, LOUISIANA

**Proposed Unit
HAYNESVILLE ZONE**

Witness: David Comeaux

DATE: 1000'

LEON E. COMEAUX & ASSOCIATES
LAFAYETTE, LOUISIANA 337-233-8639