

**CHESAPEAKE ENERGY CORPORATION**

6100 North Western Avenue  
Oklahoma City, Oklahoma 73118  
(405) 848-8000

September 29, 2021

**VIA EDGAR**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549-4628  
Attn: Anuja Majmudar

**Re: Chesapeake Energy Corporation  
Registration Statement on Form S-4  
File No. 333-259252**

Ladies and Gentlemen:

Chesapeake Energy Corporation (the "**Registrant**") hereby requests, pursuant to Rule 461 of the rules and regulations promulgated under the Securities Act of 1933, as amended, the acceleration of the effective date of the above-captioned Registration Statement to 3:00 P.M., Washington, D.C. time, on October 1, 2021 or as soon as practicable thereafter, unless the Registrant notifies you otherwise prior to such time.

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Very truly yours,

**CHESAPEAKE ENERGY CORPORATION**

By: /s/ Benjamin E. Russ

Benjamin E. Russ

Executive Vice President, General Counsel and Corporate Secretary

Cc: William N. Finnegan IV, Latham & Watkins LLP  
Kevin M. Richardson, Latham & Watkins LLP

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