

January 21, 2020

Robert D. Lawler  
President and Chief Executive Officer  
Chesapeake Energy Corporation  
6100 North Western Avenue  
Oklahoma City, Oklahoma 73118

Re: Chesapeake Energy Corporation  
Registration Statement on Form S-4  
Filed January 10, 2020  
File No. 333-235888

Dear Mr. Lawler:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Anuja A. Majmudar, Attorney-Advisor, at 202-551-3844 with any questions.

Sincerely,

Division of

Office of Energy &

Corporation Finance

Transportation

cc: Clinton W. Rancher