

**CHESAPEAKE ENERGY CORPORATION**

6100 North Western Avenue  
Oklahoma City, Oklahoma 73118

September 14, 2022

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549-6010  
Attention: Irene Barberena-Meissner

**Re: Chesapeake Energy Corporation  
Registration Statement on Form S-4 (File No. 333-266961)**

To the address set forth above:

In accordance with Rule 461 of Regulation C of the General Rules and Regulations under the Securities Act of 1933, as amended, we hereby request acceleration of the effective date of the above referenced Registration Statement on Form S-4 (the "Registration Statement") of Chesapeake Energy Corporation (the "Company"). We respectfully request that the Registration Statement become effective as of 3:00 p.m. Eastern Time on September 16, 2022, or as soon as practicable thereafter. Once the Registration Statement has been declared effective, please orally confirm that event with our counsel, Latham & Watkins LLP, by calling Kevin M. Richardson, Esq. at (713) 546-7415.

Thank you for your assistance in this matter.

Very truly yours,

**CHESAPEAKE ENERGY CORPORATION**

By: /s/ Michael May, Esq.

Michael May, Esq.

Assistant General Counsel - Corporate

cc: Kevin M. Richardson, Esq., Latham & Watkins LLP

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