

BEFORE THE OIL AND GAS CONSERVATION COMMISSION
OF THE STATE OF COLORADO

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| IN THE MATTER OF THE APPLICATION FOR AN ORDER ESTABLISHING FIELD RULES FOR DEVELOPMENT OF THE NIOBRARA FORMATION, UNNAMED FIELDS, MOFFAT COUNTY, COLORADO | | CAUSE NO. DOCKET NO. |
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APPLICATION

COMES NOW Quicksilver Resources Inc. ("Applicant"), by its attorneys, Beatty & Wozniak, P.C., and makes application to the Oil and Gas Conservation Commission of the State of Colorado for an order establishing a drilling unit for the drilling of a horizontal well in the Niobrara Formation underlying the following proposed approximate three hundred twenty (320) acre drilling unit:

Township 6 North, Range 92 West, 6th P.M.
Section 12: W½

Moffat County, Colorado ("Application Lands").

In support of its Application, Applicant avers and states as follows:

1. Applicant is a corporation duly authorized to conduct business in the State of Colorado.
2. Applicant owns leasehold interests in the Niobrara Formation underlying the Application Lands. A reference map of the Application Lands is attached as Exhibit A.
3. The Application Lands are unspaced as to the Niobrara Formation and are subject to the Commission's Rule 318.a. which provides that wells 2,500 feet or deeper shall be located not less than six hundred (600) feet from any lease line and not less than one thousand two hundred (1,200) feet from any other producible or drilling oil or gas well when drilling to the same common source of supply, unless authorized by order of the Commission upon hearing.
4. Applicant requests the right to drill a horizontal well in the Niobrara Formation in the drilling unit to be established pursuant to this Application, with the treated interval of the wellbore to be no closer than 600 feet from the boundaries of the unit (regardless of lease lines within the unit).
5. That in order to promote efficient drainage of the Niobrara Formation underlying the application lands, to prevent waste, and to protect correlative rights, the Commission should establish the drilling unit as requested herein and allow the drilling of a horizontal well in said unit. The specified size and configuration of the requested drilling unit is not smaller than the maximum area that can be economically and efficiently drained by the authorized well.
6. Applicant certifies that the names and addresses of the interested parties, according to the information and belief of the Applicant, are set forth in Exhibit B attached hereto, and that notice and a copy of this application will be served on such parties within seven days of the filing hereof, pursuant to Rule 503.e.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing in April 2012; that notice be given as required by law and that upon such hearing this Commission enter its order consistent with Applicant's request as set forth above.

Dated this _____ day of February, 2012.

BEATTY & WOZNIAK, P.C.

By: _____
Kenneth A. Wonstolen
Elizabeth Gallaway
Beatty & Wozniak, P.C.
216 Sixteenth Street-Suite 1100
Denver, CO 80202-5115

Applicant's address:
Quicksilver Resources, Inc.
ATTN: Oscar Duarte
801 Cherry Street
Suite 3700, Unit 19
Fort Worth, TX 76102

VERIFICATION

STATE OF TEXAS)
)
COUNTY OF TARRANT) ss.

Oscar Duarte, of lawful age, being first duly sworn upon oath, deposes and says that he is Senior Landman for Quicksilver Resources, Inc. and that he has read the foregoing Application and that the matters therein contained are true to the best of his knowledge, information and belief.

Oscar Duarte

Subscribed and sworn to before me this _____ day of February, 2012.

Witness my hand and official seal.

My commission expires:_____

Notary Public

Exhibit B

Quicksilver Resources Inc.
801 Cherry Street
Suite 3700, Unit 19
Fort Worth, TX 76102

A.S. Robinson
Address unknown

Kim Kaal
Energy Liaison
Colorado Division of Wildlife
711 Independent Ave.
Grand Junction, CO 81505

Kent Kuster
Colorado Department of Public
Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Jeff Comstock
Moffat County
221 W Victor Way, Suite 130
Craig, CO 81625

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AFFIDAVIT OF MAILING

| | | |
|---------------------------|---|-----|
| STATE OF COLORADO |) | |
| |) | ss. |
| CITY AND COUNTY OF DENVER |) | |

Elizabeth Y. Gallaway, of lawful age, and being first duly sworn upon her oath, states and declares:

That she is the attorney for Quicksilver Resources, Inc., and that on or before February __, 2012 she caused a copy of the attached Application to be deposited in the United States Mail, postage prepaid, addressed to the parties listed on Exhibit B to the Application.

Elizabeth Y. Gallaway

Subscribed and sworn to before me February __, 2012.

Witness my hand and official seal.

My commission expires: _____.

Notary Public