

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

IN THE MATTER OF THE APPLICATION OF)
QUICKSILVER RESOURCES INC. FOR AN)
ORDER VACATING ORDER NO. 274-1, AS) Cause No. _____
AMENDED BY 274-3, IN THE BELL ROCK)
FIELD, MOFFAT COUNTY, COLORADO) Docket No. _____
)

APPLICATION

Quicksilver Resources Inc. ("Applicant"), by and through its attorneys, Beatty & Wozniak, P.C., respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado (the "Commission") for an order to vacate Commission Order 274-1, as amended by Order No. 274-3, for the Niobrara and Mesaverde Formations, and apply statewide setbacks as set forth in Commission Rule 318.a. to the following lands:

Township 6 North, Range 92 West, 6th P.M.

Section 3: All

Section 4: All

Section 9: E $\frac{1}{2}$

Section 10: W $\frac{1}{2}$

Township 7 North, Range 92 West, 6th P.M.

Section 33: S $\frac{1}{2}$

Moffat County, Colorado ("Application Lands").

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

1. Applicant is a corporation authorized to conduct business in the State of Colorado.
2. Applicant owns leasehold interests in Moffat County, Colorado, within the areas covered by Order 274-1, as amended by 274-3 ("Subject Orders").
3. On August 21, 1973, the Commission issued Order No. 274-1 which, among other things, established 320-acre drilling and spacing units for the production of oil and gas from the Niobrara and Mesaverde formations underlying the Application Lands, as well as the E $\frac{1}{2}$ of Section 10 and the W $\frac{1}{2}$ of Section 11, Township 6 North, Range 92 West.
4. On September 15, 1986, the Commission issued Order No. 274-2 which, among other things, allowed an additional well in a portion of the Application Lands.
5. On August 17, 1987, the Commission issued Order No. 274-3 which, among other things, deleted the E $\frac{1}{2}$ of Section 10 and the W $\frac{1}{2}$ of Section 11, Township 6 North, Range 92 West, from the spaced area of the Bell Rock Field as established by Order No. 274-1, and subjected said lands to the general rules and regulations of the Commission.

6. Applicant hereby requests that the Commission vacate the Subject Orders and apply the statewide setbacks set forth in Commission Rule 318.a. to the Application Lands. A reference map is attached hereto.

7. Applicant hereby confirms that, with the exception of the Weber Federal #32-04 Well (API # 05-081-07654; the "Weber Well"), which is operated by Applicant, there are no producing wells within the Application Lands (all other wells within the Application Lands have been plugged and abandoned).. It is the intent of Applicant that the vacation of the spacing units on the Application Lands not affect the existing allocation of proceeds attributable to the Weber Well.

8. Applicant asserts the re-establishment of the statewide setbacks set forth in Commission Rule 318.a. on the Application Lands will facilitate the drilling of new horizontal wells on said lands, is in the best interests of conservation, will ensure accurate production accounting and efficient operation of the wells, and will prevent waste, protect correlative rights and to assure the greatest recovery of oil, gas, and associated hydrocarbons from Application Lands.

9. Applicant hereby verifies that the names and addresses of the interested parties according to the information and belief of the Applicant are set forth in Exhibit A attached hereto, and the undersigned certifies that copies of this Application shall be served on each interested party within the next seven days as required by Rule 503.e.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing, that notice be given as required by law and that upon such hearing this Commission enter an order to:

A. Vacate Order No. 274-1, as amended by Order No. 274-3, and apply the statewide setbacks set forth in Commission Rule 318.a. to the Application Lands.

B. Provide that the existing allocation of production revenues attributable to the Weber Well be unchanged by virtue of such vacation.

C. For such other findings and orders as the Commission may deem proper or advisable in the premises.

Dated this ___ day of March, 2012.

BEATTY & WOZNIAK, P.C.

By: _____
Elizabeth Gallaway
Kenneth A. Wonstolen
Beatty & Wozniak, P.C.
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Applicant's address:
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ATTN: Virginia E. Parsons
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Suite 3700, Unit 19
Fort Worth, TX 76102

EXHIBIT A
INTERESTED PARTIES

United States of America
Bureau of Land Management
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Craig, Colorado 81625

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Jeff Comstock
Moffat County
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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 an attorney for Quicksilver Resources Inc., that on or before April 6, 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 A to the Application.

Elizabeth Y. Gallaway

Subscribed and sworn to before me March ____, 2012.

Witness my hand and official seal.

My commission expires: _____.

Notary Public