

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 19, 2011 8:33 AM
To: Kubeczko, Dave
Subject: FW: Quicksilver Resources, Weber 32-4 Pad, SWNE Sec 4 T6N R92W, Moffat County, Form 2A (#400154141) Review

Categories: Orange Category

Scan No 2033706 CORRESPONDENCE 2A#400154141

From: vllpermitco@aol.com [mailto:vllpermitco@aol.com]
Sent: Monday, April 18, 2011 2:16 PM
To: Kubeczko, Dave
Subject: Re: Quicksilver Resources, Weber 32-4 Pad, SWNE Sec 4 T6N R92W, Moffat County, Form 2A (#400154141) Review

Dave,

Quicksilver is in agreement with the changes listed below. Yes, a closed loop system will be used.

I will send you a revised location drawing showing the 400' boundary as soon as I get it.

Thank you!
Venessa

-----Original Message-----

From: Kubeczko, Dave <Dave.Kubeczko@state.co.us>
To: VLLPermitco@aol.com
Sent: Mon, Apr 18, 2011 2:12 pm
Subject: Quicksilver Resources, Weber 32-4 Pad, SWNE Sec 4 T6N R92W, Moffat County, Form 2A (#400154141) Review

Vanessa,

I have been reviewing the Weber 32-4 Pad **Form 2A** (#400154141). COGCC requests the following clarifications regarding the data Quicksilver Resources has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. In addition, COGCC would like to attach the following conditions of approval (COAs) to the Form 2A.

1. **Construction (Section 6):** The box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds be used? has been marked **Yes**; therefore the following conditions of approval (COAs) will apply:
 - COA 11** - Either a lined drilling pit or closed loop system (which operated has indicated on the Form 2A – Section 6. Construction) must be implemented.
 - COA 12** - Production pits, if constructed, must be lined.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 3267 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages, dry washes, abandoned gravel pits), as well as, perennial streams. COGCC's review indicates there is an intermittent stream located approximately 1302 feet to the north-northwest of the well pad. I can make this change if you send an email with this request.
3. **Rule 303.d.(3).C.:** The location drawing should have a 400-foot line extending from the edge of disturbance showing any improvements within 400-feet of the proposed well.
4. **General:** The following conditions of approval (COAs) will also apply:
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

COA 38 - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

COA 39 - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COA 25 - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

COA 58 - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 4) to the Form 2A permit prior to passing the OGLA review. The other issues (items 2 and 3) also need to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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