

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, November 17, 2011 9:42 AM
To: Kubeczko, Dave
Subject: FW: Quicksilver Resources, Pirtlaw Partners Ltd 24-33 Pad, SESW Sec 33 T7N R87W, Routt County, Form 2A (#400217163) Review

Categories: Orange - Operator Correspondence

Scan No 2034077 CORRESPONDENCE 2A#400217163

From: Cindy Keister [mailto:ckeister@qrinc.com]
Sent: Wednesday, November 09, 2011 6:31 AM
To: Kubeczko, Dave
Cc: Pamela Osburn
Subject: FW: Quicksilver Resources, Pirtlaw Partners Ltd 24-33 Pad, SESW Sec 33 T7N R87W, Routt County, Form 2A (#400217163) Review

Quicksilver agrees to the following COA's.

Cindy Keister
Director Regulatory Affairs
Quicksilver Resources
801 Cherry Street
Suite 3700, Unit 19
Fort Worth, Texas 76102

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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, November 08, 2011 4:47 PM
To: Pamela Osburn
Subject: Quicksilver Resources, Pirtlaw Partners Ltd 24-33 Pad, SESW Sec 33 T7N R87W, Routt County, Form 2A (#400217163) Review

Pam,

I have been reviewing the Pirtlaw Partners Ltd 24-33 Pad Form 2A (#400217163). COGCC requests the following clarifications regarding the data Quicksilver 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 (OBM) be used? has been marked **Yes**; therefore the following condition of approval (COA) will apply:
COA 11 - The drilling pit, if constructed, must be lined, or a closed loop system (which operator has indicated on the Form 2A) must be implemented during drilling. All cuttings generated during drilling with OBM/high

chloride mud must be kept in the lined drilling pit, or placed either in containers or on a lined/bermed portion of the well pad; prior to analysis and/or offsite disposal.

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.

2. **General:** The following conditions of approval (COAs) will apply:

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface or buried pipelines.

COA 23 - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

COA 25 - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment 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.

COA 44 - The access road will be constructed to prevent sediment migration from the access road to nearby surface water or any drainages leading to other nearby surface waters.

3. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), and a reference area has been indicated on a topographic map; four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (10/31/2011).

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 2) to the Form 2A permit prior to passing the OGLA review. The other issue (item 3) also needs to be addressed (either reference area pictures can be submitted now and attached to the permit prior to approval, or they can be submitted later with a Form 4 Sundry Notice). If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

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