

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 17, 2012 11:02 AM
To: Kubeczko, Dave
Subject: FW: Quicksilver Resources, Simoes 31-30 Pad, Lot 6 Sec 30 T6N R90W, Moffat County, Form 2A (#400264524) Review

Categories: Orange - Operator Correspondence

Scan No 2034307 CORRESPONDENCE 2A#400264524

From: Cindy Keister [mailto:ckeister@qrinc.com]
Sent: Tuesday, April 10, 2012 11:54 AM
To: Kubeczko, Dave
Cc: Pamela Osburn
Subject: RE: Quicksilver Resources, Simoes 31-30 Pad, Lot 6 Sec 30 T6N R90W, Moffat County, Form 2A (#400264524) Review

Dave,

Quicksilver approves the following COA's.

Thanks

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

Direct Line: 817/665-5572
Cell: 682/429-3861

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From: Pamela Osburn
Sent: Tuesday, April 10, 2012 12:47 PM
To: Cindy Keister
Subject: FW: Quicksilver Resources, Simoes 31-30 Pad, Lot 6 Sec 30 T6N R90W, Moffat County, Form 2A (#400264524) Review

Pamela Osburn
Sr. Regulatory Analyst

From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]

Sent: Tuesday, April 10, 2012 12:32 PM

To: Pamela Osburn

Subject: Quicksilver Resources, Simoes 31-30 Pad, Lot 6 Sec 30 T6N R90W, Moffat County, Form 2A (#400264524) Review

Pam,

I have been reviewing the Simoes 31-30 Pad **Form 2A** (#400264524). COGCC would like to attach the following conditions of approval (COAs) based on the information Quicksilver has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

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** - A closed loop system must be implemented during drilling (which operator has indicated on the Form 2A); or, if a drilling pit is constructed, it must be lined. All cuttings generated during drilling with oil based muds or high chloride/TDS 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 offsite disposal. 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 pipelines.
 - COA 6** - Reserve pit must be lined or a closed loop system must be implemented during drilling.
 - 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 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 and/or filters before the fluids can be placed into any pipeline or pit. 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.
 - COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. 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

Colorado Oil & Gas Conservation Commission

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