

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, April 17, 2012 11:04 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Quicksilver Resources, Simoes 12-30 Pad, Lot 9 Sec 30 T6N R90W, Moffat County, Form 2A (#400265862) Review

**Categories:** Orange - Operator Correspondence

Scan No 2034308      CORRESPONDENCE      2A#400265862

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**From:** Cindy Keister [<mailto:ckeister@qrinc.com>]  
**Sent:** Tuesday, April 10, 2012 11:55 AM  
**To:** Kubeczko, Dave  
**Cc:** Pamela Osburn  
**Subject:** FW: Quicksilver Resources, Simoes 12-30 Pad, Lot 9 Sec 30 T6N R90W, Moffat County, Form 2A (#400265862) Review

Dave,

Quicksilver approves the following COA's for the Simoes 12-30 Pad.

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 12-30 Pad, Lot 9 Sec 30 T6N R90W, Moffat County, Form 2A (#400265862) Review

Pamela Osburn  
Sr. Regulatory Analyst

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

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

**To:** Pamela Osburn

**Subject:** Quicksilver Resources, Simoes 12-30 Pad, Lot 9 Sec 30 T6N R90W, Moffat County, Form 2A (#400265862) Review

Pam,

I have been reviewing the Simoes 12-30 Pad **Form 2A** (#400265862). 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 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**

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